

PART 70 OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

Indianapolis Airport Authority
2500 South High School Road
Indianapolis, Indiana 46241

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.:T097-9602-00156	
Originally signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 26, 2003
John Chavez Administrator, OES	Expiration Date: June 26, 2008

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Semi-Annual Natural Gas Fired Boiler Certification
Quarterly Report
Quarterly Deviation and Compliance Monitoring Report
Monitoring Exceedance Summary (Part 1)
Monitoring Exceedance Summary (Part 2)
Attachment A (state rules adopted by reference)

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft.

Responsible Official:	Airport Director
Source Address:	2825 West Perimeter Road, Indianapolis, Indiana 46241
Mailing Address:	2500 S. High School Rd., Indianapolis, Indiana 46241
General Source Phone Number:	317-757-2536
SIC Code:	4581
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, Section 112 of the Clean Air Act
	Minor Source under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 001, installed in 1993.
- (b) Boiler #2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 002, installed in 1993.
- (c) Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 003, installed in 1994.
- (d) Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 004, installed in 1994.
- (e) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 005, and installed in 1993.
- (f) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.
- (g) Emergency Generator #3, manufactured by Cummins, model number KTA39-G4,

identified as emission unit 007, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.

- (h) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.
- (i) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel, with maximum horse power rating of 480, exhausted out one stack identified as stack 009, and installed in 1993.
- (j) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 010, and installed in 1993.
- (k) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 011, and was installed in 1993.
- (l) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 012, and was installed in 1993.
- (m) Painting and mixing operations including:
 - (1) Two (2) paint booths, located in the Composite shop, identified as emission unit 017, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to two stacks 017a and 017b, installed in 1995.
 - (2) Two (2) paint booths, located in the Machine Shop and the Interior Shop, respectively, identified as emission unit 018, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to two stacks 018a and 018b, installed in 2000 and 2001, respectively.
- (n) Eight (8) service hangars with activities relating to the coating of aircraft parts are identified as emissions unit EU-013, service hangars 1, 2, 3, 5, 6, 7, and 7a are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVLP) spray applications systems, and all hangars consisting of two enclosed bays. Hangar 4 is an external hangar used for routine and non-routine maintenance. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 4	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996
Hangar 7	July 15, 1997
Hangar 7a	1999

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Four (4) Jet A fuel storage tanks of a capacity of 25,000 gallons or approximately 95 cubic meters, with potential VOC emissions less than 3 pounds per hour and less than 10 tons per year located in the fuel farm on the east side of the maintenance facility.[326 IAC 12][40 CFR 60.110b, Subpart Kb]
- (b) The following degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]. These degreasing operations are located throughout the center.
 - (1) Parts Cleaner PW-01
 - (2) Parts Cleaner PW-02
 - (3) Parts Cleaner PW-03
 - (4) Parts Cleaner PW-04
 - (5) Parts Cleaner PW-08
 - (6) Parts Cleaner currently located in the lower part of hangar 5-A, room 123.
 - (7) Parts Cleaner currently located in the lower part of hangar 6-A on the side wall.
 - (8) Parts Cleaner currently located in the lower part of hangar 6-A usually situated near the left wing of the aircraft.
 - (9) Parts Cleaner PW-11
 - (10) Parts Cleaner PW-12
 - (11) Parts Cleaner located in the lower part of hangar 7B.
 - (12) Parts Cleaner PW-19
 - (13) Parts Cleaner in the Non Destructive Testing (NDT) area near the Magnaflux.
 - (14) Parts Cleaner AC-10
 - (15) Parts Cleaner PW-20
 - (16) Parts Cleaner PW-06
 - (17) Parts Cleaner PW-09
 - (18) Parts Cleaner currently located in the lower cleaning room of hangar 7A
 - (19) Parts Cleaner currently located in the upper cleaning room of hangar 7A
- (c) The following grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day :[326 IAC 6-3]
 - (1) Grit Blast Cabinet BC-01
 - (2) Grit Blast Cabinet BC-02
 - (3) Grit Blast Cabinet BC-06
 - (4) Grit Blast Cabinet BC-07
 - (5) Grit Blast Cabinet BC-14
 - (6) Grit Blast Cabinet BC-13
 - (7) Grit Blast Cabinet BC-09
 - (8) Grit Blast Cabinet BC-12
 - (9) Grit Blast Cabinet BC-10
 - (10) Grit Blast Cabinet BB-01
 - (11) Grit Blast Cabinet BB-02
 - (12) Grit Blast Cabinet BC-05
 - (13) Grit Blast Cabinet BC-15
 - (14) Grit Blast Cabinet BC-16
 - (15) Grit Blast Cabinet EE-02
 - (16) Grit Blast Cabinet PM-01
 - (17) Grit Blast Cabinet BC-08
 - (18) Grit Blast Cabinet BC-17
 - (19) Grit Blast Cabinet BC-18

- (20) Grit Blast Room in the Sheet Metal Shop
- (21) Grit Blast Cabinet BC-03
- (22) Grit Blast Cabinet BC-04
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (e) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3]
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21) [326 IAC 6-3]
 - (1) The following five emission units located throughout the facility including the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year:
 - (A) Downdraft Benches
 - (B) ECB Booth
 - (C) Fugitives (Cleaning)
 - (D) Sanding Benches
 - (E) Touchup Booths
- (h) The following three emission units located in the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (1) Cleaning Room
 - (2) Dinol Room
 - (3) Fugitives (Cleaning)
- (i) The following two emission units located in the Sidewall/Ceiling Shop of the Interior Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (1) Drawdown Bench for Vacuum mold
 - (2) Floorboard Router
- (j) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38E C (100EF) or having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located throughout the Center. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year [40 CFR 63 Subpart GG][326 IAC 20]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, or OES, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific conditions in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Administrator within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the

emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM's phone and facsimile numbers:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

OES's phone and facsimile numbers:

Telephone Number: 317/327-2234

Facsimile Number: 317/327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall

constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (j) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
 - (1) All references to Boiler 1 as being a 10.24 MMBtu/hr boiler were revised to refer to this emission unit as a 12.6 MMBtu/hr boiler. All emissions calculations will reflect this revised capacity.
 - (2) All references to Boiler 2 as being a 20.49 MMBtu/hr boiler were revised to refer to this emission unit as a 25.2 MMBtu/hr boiler. All emissions calculations will reflect this revised capacity.
 - (3) All references to boilers 3 and 4 (Emission Units 3 and 4) as being 106 MMBtu/hr boilers were revised to refer to these emission units as 122 MMBtu/hr boilers. All emissions calculations will reflect these revised capacities.
 - (4) Condition 15 f of 096-00156-01 was amended to specify that small aerosol spray paint cans are not included.
 - (5) All references to 326 IAC 2-1 from previous construction permits were amended to refer to 326 IAC 2-1.1
 - (6) The requirement from condition 9 of 096-00156-01, issued November 25, 1996, listing requirements pursuant 326 IAC 6-1-2 (b)(4) and pursuant to 326 IAC 6-1-2(b)(5) are not applicable since the actual PM emissions do not exceed 10 tons per year and potential PM emissions do not exceed 100 tons per year. IDEM, OAQ and OES have determined that there was an error in rule applicability in the previous construction permit.
 - (7) The requirement from condition 13 of 096-00156-01, issued November 25, 1996, listing requirements to estimate the Jet A fuel equivalence in cubic feet of natural

gas in order to stay below SO₂ emission limitations, and to keep records of this usage is not necessary because equivalent natural gas usage greatly exceeds source wide potential natural gas usage.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326

IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (2) If IDEM, OAQ, and OES, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, and OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue

Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, and OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2] [40 CFR 52 Subpart P]
- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not

federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 60, Subpart Db.

C.13 Maintenance of Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary continuous opacity monitors and related equipment.
- (b) In the event that a breakdown of the continuous opacity monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever the continuous opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.
 - (1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is

sufficient daylight.

- (2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.
- (3) All of the opacity readings during this period shall be reported in the quarterly Deviation and Compliance Monitoring Reports.
- (d) Nothing in this condition or in Section D of the permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 63, Subpart D.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on 11/27/96.
- (b) If the ERP is disapproved by IDEM, OAQ, and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold

quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to IDEM, OAQ and OES.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by

326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year). The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years unless otherwise specified in an applicable rule.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel or off-spec Jet A fuel, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 001, installed in 1993.

Boiler #2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 002, installed in 1993.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(b)(5)][CP096-00156-01]

The requirements from CP096-00156-01, issued November 25, 1996, Condition 9 that particulate limits for the 12.6 and 25.2 million Btu/hour boilers are limited to 0.15 pounds per million BTU when combusting Jet A fuel, and that the particulate limits for the 12.6 and 25.2 million Btu/hour boilers are limited to 0.01 grains per dry standard cubic foot when burning Natural Gas pursuant to 326 IAC 6-1-2(b)(5), are no longer applicable since actual PM emissions for the entire source do not exceed 10 tons per year and potential PM emissions for the entire source do not exceed 100 tons per year. Thus, Condition 9 of CP096-00156-01, is hereby rescinded.

D.1.2 Sulfur Dioxide (SO₂) [CP096-00156-01]

The requirements from CP096-00156-01, issued November 25, 1996, Condition 13, that the source should estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO₂ emission limitations and to keep records of this usage was eliminated since equivalent natural gas usage greatly exceeds source wide potential natural gas usage. Thus, the Condition 13 requirement to estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO₂ emission limitations and to keep records of this usage is hereby rescinded.

D.1.3 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

D.1.4 Sulfur Dioxide (SO₂) Limitations [326 IAC 7-1.1-1] [40 CFR 60.42c(d)][326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) While burning Jet A fuel (or off-spec Jet A fuel in Boiler #1), the SO₂ emissions from each of the 12.6 or 25.2 MMBtu per hour boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the Jet A fuel or Jet A off-spec fuel shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (c) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.
- (d) Pursuant to 40 CFR 60.42b(j), the Permittee shall ensure that the Jet A fuel or Jet A off-spec fuel used meets the definition of a "very low sulfur oil," meaning oil that contains

no more than 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu.

D.1.5 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from each of the boilers shall be limited to 0.423 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$\text{Where: } Pt = \frac{1.09}{Q^{0.26}}$$

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.1.6 Restrictions on Fuel Usage and Sulfur Contents [326 IAC 2-3][CP096-00156-01]

- (a) Pursuant to CP 096-00156-01, issued November 25, 1996, the Permittee shall limit the combustion of Jet A fuel and/or Jet A off-spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The fuel usage limitations under D.1.6 (which includes boilers under section D.2), D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.

Facilities	Jet A Fuel and Off-Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

- (b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel (and off-spec Jet A Fuel) to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1, 40 CFR 60.42b(j), and 326 IAC 12 specified under Condition D.1.3. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device

Compliance Determination Requirements

D.1.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR 60.42b][326 IAC 12]

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the

procedures in 40 CFR 60, Appendix A, Method 19.

- (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
- (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the #1 and #2 boilers' stack exhaust shall be performed once per shift during normal daylight operations while burning Jet A fuel. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual Jet A and off-spec Jet A fuel usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;

- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) Pursuant to 40 CFR 60.48c(g), the Permittee shall record and maintain daily records of the amount of natural gas and Jet A fuel combusted per day.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the EU1 and EU2 stack exhaust while burning Jet A or off-spec Jet A fuel.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34);
- (b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.
- (c) Quarterly summaries of the information to document compliance with Condition D.1.6 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 003, installed in 1994.

Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (MMBtu/hr), using a flue gas recirculation system as NOx control, exhausting to one stack, identified as stack 004, installed in 1994.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(b)(5)][CP096-00156-01]

The requirements from CP096-00156-01, issued November 25, 1996, Condition 9 that particulate limits for the two 122 million Btu/hour boilers, 003 and 004, are limited to 0.15 pounds per million BTU each when combusting Jet A fuel, and that the particulate limits for the 122 million Btu/hour boilers, 003 and 004, are limited to 0.01 grains per dry standard cubic foot when burning Natural Gas pursuant to 326 IAC 6-1-2(b)(5), are no longer applicable since actual PM emissions do not exceed 10 tons per year and potential PM emissions do not exceed 100 tons per year for the entire source. Thus, Condition 9 of CP096-00156-01, is hereby rescinded.

D.2.2 Sulfur Dioxide (SO₂) [CP096-00156-01]

The requirements from CP096-00156-01, issued November 25, 1996, Condition 13, that the source should estimate the Jet A equivalence in cubic feet of natural gas in order to stay below SO₂ emission limitations and to keep records of this usage was eliminated since equivalent natural gas usage greatly exceeds source wide potential natural gas usage. Thus, the Condition 13 requirement to estimate the Jet A equivalence in cubic feet of natural gas in order to stay below SO₂ emission limitations and to keep records of this usage is hereby rescinded.

D.2.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1][40 CFR 60.42b(j)][326 IAC 12]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the boilers 003 and 004 shall not exceed five-tenths (0.5) pound per million Btu heat input each while combusting Jet A fuel. Pursuant to 40 CFR 60.42b(j), the Permittee shall ensure that the Jet A fuel used meets the definition of a "very low sulfur oil," meaning oil that contains no more than 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu.

D.2.4 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from each boiler, 003 or 004, shall be limited to 0.251 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$W Pt = \frac{1.09}{Q^{0.26}} \text{ here:}$$

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The maximum heating capacity rating is defined as the maximum capacity at which the facility is

operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.2.5 Nitrogen Oxides (NO_x) [40 CFR 60 Subpart Db][326 IAC 12]

Pursuant to 40 CFR 60.44b(a) the emissions of nitrogen oxides (NO_x) for the 122 MMBtu per hour boilers 003 and 004 shall be limited to 0.1 pounds per million Btu each. Pursuant to 40 CFR 60.44b(h) the nitrogen oxide standard applies at all times including startup, shutdown and malfunctions. Pursuant to 40 CFR 60.44b(i) compliance with this emissions limitation shall be determined on a 30 day rolling average basis.

D.2.6 Restrictions on Fuel Usage [326 IAC 2-3] [CP 960156-01 Condition 13]

- (a) The Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The sum of the fuel usage limitations under D.1.5 (which includes boilers under section D.2), D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.

Facilities	Jet A Fuel
One (1) 12.6, one (1) 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

- (b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1, 40 CFR 60.42b(j), and 326 IAC 12 specified under Condition D.2.3. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

D.2.7 Opacity [40 CFR 60.43b(f)][326 IAC 12]

Pursuant to 40 CFR 60 Subpart Db, opacity from the two 122 MMBtu per hour boilers, 003 and 004, shall not be in excess of 20% opacity except for one 6-minute period per hour of not more than 27% opacity. This opacity limit only applies when combusting fuel oil (Jet A fuel). Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS subpart Db. Pursuant to 40 CFR 60.43b(g) the opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, or whenever not combusting Jet A fuel or any other "oil."

D.2.8 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR 60, Subpart Db.

D.2.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.10 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR 60.42b][326 IAC 12]

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.2.11 Continuous Emissions Monitoring System (CEMS) for Nitrogen Oxides (NOx) [326 IAC 3-5][40 CFR 60 Subpart Db]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11 [40 CFR 60, Subpart Db), a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring nitrogen oxides from boilers 003 and 004, which meets the performance specifications
- (b) When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

D.2.12 Continuous Opacity Monitoring [326 IAC 3-5][326 IAC 5-1-2(2)]

Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11, and 40 CFR 60, Subpart Db, a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring opacity from boilers 003 and 004, which meets the performance specifications of 326 IAC 3-5-2 and 40 CFR 60, Subpart Db.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.13 NOx Readings

- (a) Pursuant to 326 IAC 3-5-2 (Continuous Monitoring of Emissions; Minimum Performance and Operating Specifications), the Nitrogen Oxide emissions from any combination of operating boilers identified as 003 and 004 shall be performed on a continuous basis using continuous emission monitoring (CEM) device(s) installed, calibrated, maintained and operated in compliance with all applicable requirements of 326 IAC 3-5 and 40 CFR 60 Appendix B.
- (b) Appropriate response steps shall be taken in accordance with Section C.18 - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the Nitrogen Oxides exceed 0.1 pounds per million Btu, determined on a 30 day rolling average basis, when combusting Natural Gas as indicated in Condition D.2.5. Failure to take response steps in accordance with Section C.18 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.14 Opacity Readings

- (a) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity exceeds 20% opacity except for one 6-minute period per hour of not more than 27% opacity. Failure to take response steps in accordance with Section C - Compliance

Response Plan - Preparation, Implementation, Records, and Reports, shall be considered by the certified continuous opacity monitor required in Condition D.2.12.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.3 and D.2.6 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limits established in Conditions D.2.3 and D.2.6.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual Jet A fuel usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel.
- (b) To document compliance with Section C - Opacity and Conditions D.2.7 and D.2.12, the Permittee shall maintain records in accordance with (1) through (5) below:
- (1) Data and results from the most recent stack test,
 - (2) All continuous monitoring data, pursuant to 326 IAC 3-5 and 40 CFR 60, Subpart Db,
 - (3) All preventive measures taken.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (10) below. Records maintained for (1) through (10) shall be taken daily and shall be complete and sufficient to establish compliance with the NO_x emission limit established in Condition D.2.5.
- (1) Calendar Date
 - (2) The average hourly nitrogen oxides emission rates (expressed as NO_x)(ng/J or lb/million Btu heat input) measured or predicted.
 - (3) The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
 - (4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
 - (5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.

- (6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
 - (7) Identification of "F" factor used for calculations, methods of determination, and type of fuel combusted.
 - (8) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.
 - (9) Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.
 - (10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1.
- (d) To document compliance with the record keeping requirements of 40 CFR 60.49b(d), the Permittee shall maintain records of the amount of natural gas and Jet A fuel combusted per day.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit, and the Permittee shall maintain records required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA., if so requested or required.

D.2.16 Reporting Requirements

- (a) A natural gas boiler certification, signed by the responsible official, that certifies all of the fuels combusted during the period shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34);
- (b) Quarterly summaries of the information to document compliance with Condition D.2.6 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7 and 40 CFR 60.63(d), from the continuous monitoring system shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 005, and installed in 1993.

Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.

Emergency Generator #3, manufactured by Cummins, model number KTA39-G4, identified as emission unit 007, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.3.1 Restrictions on Fuel Usage [326 IAC 2-3] [CP 960156-01]

- (a) Pursuant to CP 960156-01 Condition 13, issued on November 25, 1996, the Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The sum of the fuel usage limitations under D.1.5 (which includes boilers under section D.2), D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Facilities	Jet A Fuel
Three 1,505 HP Cummins Emergency Generator Engines combined	111,360

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

- (b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 weight percent. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Compliance Determination Requirements

D.3.2 Sulfur Dioxide Emissions [326 IAC 7-1.1-1][326 IAC 3-6][326 IAC 3-7]

- (a) Compliance with the SO₂ limit in Section D.3.1 shall be demonstrated utilizing one of the following options:
- (1) Pursuant to 326 IAC 3-7-4 (Jet A fuel Sampling; Analysis Methods), sample and analyze each shipment of Jet A fuel received for sulfur content and heat content. Providing vendor analysis of fuel delivered is an acceptable substitute for analysis, if accompanied by a certification, or
 - (2) Pursuant to 326 IAC 3-6 (Source Sampling Procedures), conduct a stack test for SO₂ emissions using 40 CFR Part 60 Appendix A Method 6, 6A, 6C or 8 or other approved method(s) in accordance with the procedures in 326 IAC 3-6.
- (b) Pursuant to 326 IAC 7-2 (Sulfur Dioxide Compliance: Reporting and Methods to Determine Compliance), computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in the USEPA publication AP-42 "Compilation of Air Pollutant Emission Factors" unless other

emission factors based on site-specific sulfur dioxide measurements are approved by IDEM, OAQ and OES.

Compliance or noncompliance with distillate Jet A fuel fired combustion units shall be determined using a calendar month average sulfur dioxide emission rate in pounds per million Btu.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

To document compliance with Condition D.3.1, the Permittee shall maintain records of calendar month average fuel sulfur content, heat content, fuel consumption and sulfur dioxide emission rate. Records maintained shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.3.1.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Fire Pump Engine #1 manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.

Fire Pump Engine #2 manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel, with maximum horse power rating of 480, exhausted out one stack identified as stack 009, and installed in 1993.

Fire Pump Engine #3 manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 010, and installed in 1993.

Fire Pump Engine #4 manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 011, and was installed in 1993.

Fire Pump Engine #5 manufactured by Detroit Diesel, model number DD FP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 012, and was installed in 1993.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Restrictions on Fuel Usage [326 IAC 2-3]

- (a) Pursuant to CP 960156-01 Condition 13, issued on November 25, 1996, the Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on 12 consecutive month period with compliance determined at the end of each month. The sum of the fuel usage limitations under D.1.5 (which includes boilers under section D.2), D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Facilities	Jet A Fuel
Five 480 HP Detroit Diesel Fire Pump Engines combined	7,500

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

- (b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 weight percent. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Compliance Determination Requirements

D.4.2 Sulfur Dioxide Emissions [326 IAC 7-1.1-1][326 IAC 3-6][326 IAC 3-7]

- (a) Compliance with the SO₂ limit in Section D.4.1 shall be demonstrated utilizing one of the following options:
- (1) Pursuant to 326 IAC 3-7-4 (Fuel oil Sampling; Analysis Methods), sample and analyze each shipment of fuel oil received for sulfur content and heat content. Providing vendor analysis of fuel delivered is an acceptable substitute for analysis, if accompanied by a certification, or

- (2) Pursuant to 326 IAC 3-6 (Source Sampling Procedures), conduct a stack test for SO₂ emissions using 40 CFR Part 60 Appendix A Method 6, 6A, 6C or 8 or other approved method(s) in accordance with the procedures in 326 IAC 3-6.
- (b) Pursuant to 326 IAC 7-2 (Sulfur Dioxide Compliance: Reporting and Methods to Determine Compliance), computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in the USEPA publication AP-42 "Compilation of Air Pollutant Emission Factors" unless other emission factors based on site-specific sulfur dioxide measurements are approved by IDEM, OAQ and OES.

Compliance or noncompliance with distillate Jet A fuel fired combustion units shall be determined using a calendar month average sulfur dioxide emission rate in pounds per million Btu.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Record Keeping Requirements

To document compliance with Condition D.4.1, the Permittee shall maintain records of calendar month average fuel sulfur content, heat content, fuel consumption and sulfur dioxide emission rate. Records maintained shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.4.1.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(a) shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Painting and mixing operations including:

- (1) Two (2) paint booths, located in the Composite shop, identified as emission unit 017, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to two stacks 017a and 017b, installed in 1995.
- (2) Two (2) paint booths, located in the Machine Shop and the Interior Shop, respectively, identified as emission unit 018, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to two stacks 018a and 018b, installed in 2000 and 2001, respectively.

Eight (8) service hangars with activities relating to the coating of aircraft parts are identified as emissions unit EU-013, service hangars 1, 2, 3, 5, 6, 7, and 7a are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVLP) spray applications systems, and all hangars consisting of two enclosed bays. Hangar 4 is an external hangar used for routine and non-routine maintenance.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] [CP-096-00156-01 Condition 15]

Pursuant to CP 960156-01 Condition 13, issued on November 25, 1996, and to operating procedures outlined in the top down BACT analysis in accordance with 326 IAC 8-1-6, the Permittee shall achieve Best Available Control Technology for coatings used in the Service Hangars and Indirect Support Shops as specified below:

- (a) The Permittee shall not apply to aerospace components any coating in the following categories with a VOC content in excess of the following limits (except as noted in condition b), expressed as grams of VOC per liter (lbs/gal) of coating as applied, excluding water:

Coating Category	VOC content	
	g/liter	lbs/gal
Primer - coatings applied directly to the aerospace component for the purpose of corrosion prevention, protection from the environment, functional fluid resistance and adhesion of subsequent coatings.	350	2.9
Adhesive bonding primer - coatings applied in a very thin film to aerospace metal for the primary purpose of providing a primer for a subsequent coating of structural adhesive.	850	7.1
Interior Topcoat - coating used in interior habitable spaces of aircraft	340	2.8
Electric or Radiation Effect Coating - Electrical conductive or insulative coatings and coatings used on radar and antennae enclosures.	800	6.7
Extreme Performance Interior Top Coat - A topcoat used in interior spaces of the aircraft areas requiring fluid, stain or nicotine barrier.	420	3.5

Coating Category	VOC content	
	g/liter	lbs/gal
Fire Insulation Coating - Coatings used to provide a layer of insulation in the event of an aircraft or engine fire.	600	5.0
Fuel Tank Coating - Coatings applied to the interior of a fuel tank or fuel-wetted area of the aircraft to protect it from corrosion.	720	6.0
High-Temperature Coating - A coating that during its normal use must withstand temperatures in excess of 350 degrees Fahrenheit.	720	6.0
Sealant - A coating applied for the purpose of filling voids and providing a barrier against penetration of water, fuel or other fluids or vapors.	600	5.0
Self-priming Topcoat - A coating applied directly to the aerospace component that is not subsequently over coated.	420	3.5
Topcoat - Coatings applied over a primer or intermediate coating for the purposes such as appearance, identification or protection.	420	3.5
Pretreatment Wash Primer - A coating which contains a minimum of 0.5% acid by weight for surface etching and is applied directly to a bare metal surface to provide corrosion resistance and adhesion.	420	3.5
Sealant Bonding Primer - A coating applied in a very thin film to an aerospace component for the purposes of providing a primer for subsequent coat of silicon sealant.	720	6.0
Temporary Protection Coating - A coating applied to an aerospace component to protect it from any mechanical or environmental damage during manufacturing.	250	2.1

- (b) The aforementioned coating requirements shall not apply to:
- (1) Application of coating to assembled printed circuit boards
 - (2) Coating of paper, fabrics and films
 - (3) Applications of adhesives
 - (4) Use of Adhesive bonding primers that have a cure temperature in excess of 325 °F
 - (5) Use of hand held non-refillable aerosol cans
 - (6) Application of coatings by template or hand in order to add designs, letters and/or numbers to the products
 - (7) Application of a solid film lubricant (anti-chafe coating)
 - (8) Coating of test panels used to evaluate coating performance
 - (9) Use of low usage coating which are coating with separate formulations that are used in volumes of less than 20 gallons per calendar year, provided that the requirements of D.5.1(c) are met and no more than 200 gallons of low usage

coatings may be classified as exempt per calendar year.

- (c) Annually the Permittee shall provide a list in writing to OES of coatings to be covered under the low usage exemptions D.5.1(b)(9) for the following calendar year, the expected volume to be used and the maximum VOC content. The Permittee shall notify OES in writing of any additional coatings added to this list during the calendar year.
- (d) The Permittee shall maintain a document containing a list of all coatings with coating limitations which may be used during the following year, the coating category, the VOC limit for the coating category, the mix ratio (if applicable), and VOC content of the coating as applied expressed as pounds per gallon of coating less water. This document will be updated periodically and in the interim, memos containing the required information will be issued as needed for new coatings or reformulations of existing coatings.
- (e) Compliance with the coating limitations shall be based on methods specified in 326 IAC 8-1-4 (a).
- (f) The Permittee shall utilize High Volume, Low Pressure (HVLP) and/or touch up guns transfer technology when applying coatings by spray. HVLP shall mean coating equipment which is used to apply coatings by means of a gun that operates between 0.1 and 10 psig air atomizing spray. Touch up guns shall mean small air-spray equipment, including air brushes, that operate at no greater than 5 cfm air flow and no greater than 50 psig air pressure. These requirements do not apply to aerosol spray paint cans or the following.
 - (1) The application of coatings to surface areas with limited access due to visual impairment which requires a 360 degree spray-gun extension.
 - (2) The application of waterborne extreme performance interior topcoat coating.
 - (3) The application of adhesive bonding primers and pretreatment wash primers.
 - (4) The application of a textured finish coat. A textured finish coat shall be considered any coating used to produce a non-smooth, patterned surface that is intentionally produced and applied as a final coat by spraying drops of coating over a previously applied base coat.

D.5.2 General Provisions Relating to HAPS [326 IAC 20-1-1][40 CFR 63 Subpart A]

The provisions of 40 CFR Part 63 Subpart A-General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63 Subpart GG, Table 1.

D.5.3 Aerospace NESHAP [40 CFR 63 Subpart GG][326 IAC 20]

This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.741, Subpart GG), even though HAP emissions are less than major source thresholds, because the potential to emit HAPs at the time of rule promulgation was assumed to be greater than the major source thresholds (based on EPA determination).

- (a) Except for coatings and coating operations listed in 40 CFR 63.742 or those coatings or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled primer coating operations. Organic HAP and VOC content limits: 350 grams/liter (2.9 lb/gal less water for HAP and less water and exempt solvents for VOC) as applied. Compliance shall be achieved through:
 - (1) using coatings below content limits, or
 - (2) using monthly volume weighted averaging (primers only) to meet content limits [40 CFR 63.745(e)]
- (b) Except for the use of specialty coatings as defined in 40 CFR 63.742 or those coatings

or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled topcoat coating operations. Organic HAP and VOC content limit: 420 g/l (3.5 lb/gal less water for HAP, and less water and exempt solvents for VOC) as applied. [40 CFR 63.745(c)(3)-(4)] Compliance shall be achieved through:

- (1) using coatings below content limits, or
 - (2) Using monthly volume weighted averaging (topcoats) to meet content limits [40 CFR 63.745(e)]
- (c) With respect to all coating applications operations, the following conditions apply:
- (1) Pursuant to 40 CFR 63.745(b), minimize spills during handling and transfer of all materials. Pursuant to 40 CFR 63.748 minimize spills during handling and transfer of waste materials which contain HAPS.
 - (2) Pursuant to 40 CFR 63.745(f)(1), specific application techniques must be used.
 - (3) Pursuant to 40 CFR 63.745(f)(2), all application equipment must be operated according to manufacturers specifications, company procedures, or operating procedures (whichever is most stringent).
 - (4) Pursuant to 40 CFR 63.745(g)(2), operating requirements must be followed for the application of primers or topcoats that contain inorganic HAP, including control with particulate filters (see Tables 1 through 4 of 40 CFR 63.745). Painting operation(s) must be shutdown if operated outside manufacturers specified limits.

D.5.4 Particulate Matter (PM)[40 CFR 52 Subpart P]

Pursuant to CP-096-00156-01, issued on November 25 1996, and 40 CFR 52 Subpart P, the PM from the four (4) paint booths (017 and 018) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.5.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.5.7 Volatile Organic Compounds [40 CFR 63, Subpart GG] [326 IAC 20]

Compliance with the VOC content and usage limitations contained in Condition D.5.1 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the right to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.8 VOC Emissions [40 CFR 63, Subpart GG] [326 IAC 20]

Pursuant to 40 CFR 63.749(d)(1), for uncontrolled coatings that are not averaged, each 24 hour period is considered a performance test; for uncontrolled coatings which are averaged, each 30

day period is considered a performance test. An organic HAP content level determination is made pursuant to 40 CFR 63.750(c) and (d), and a VOC content level determination is made pursuant to 40 CFR 63.750(e) and (f). An initial performance test is required for all control devices used to control VOC and organic HAPS to demonstrate compliance with overall control efficiency requirements, pursuant to 40 CFR 63.749(d)(2).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Dry Particulate Filters [40 CFR 63, Subpart GG] [326 IAC 20]

Pursuant to 40 CFR 63.751(c)(1), the Permittee shall, while the primer or topcoat application operations are occurring, continuously monitor the pressure drop across the system, and read and record pressure drop once per shift.

D.5.10 Visible Emissions Notations The painting operations EU 18 have applicable monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the over spray from the surface coating booth stack 018 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5,
 - (1) the Permittee shall maintain a document containing a list of all coatings with coating limitations which may be used during the following year, the coating category, the VOC limit for the coating category, the mix ratio (if applicable), and VOC content of the coating as applied expressed as pounds per gallon of coating less water. This document will be updated periodically and in the interim, memos containing the required information will be issued as needed for new coatings or reformulations of existing coatings.
 - (2) Pursuant to Condition D.5.1 and 326 IAC 8-1-6, the Permittee shall maintain documentation for all coatings containing the name of the coating and VOC

content as received and applied. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (a) Pursuant to 40 CFR 63.752(c)(2), for uncontrolled primer and topcoat applications that meet organic HAP and VOC content limits without averaging, the Permittee shall maintain documentation containing organic HAP and VOC contents as applied, data/calculations and test results used to determine HAP/VOC content as (H_i and G_i), and monthly usage.
- (b) Pursuant to Conditions D.5.1 and D.5.3 and 40 CFR 63.752(c)(3), for "Low HAP content" primer and topcoat applications (as described in 40 CFR 63.752(c)(3)), the Permittee shall maintain a documents containing annual purchase records, and data/calculations and test results used to determine H_i or HAP/VOC content as applied.
- (c) Pursuant to Conditions D.5.1 and D.5.3 and 40 CFR 63.752(c)(4), for uncontrolled primer and topcoat applications complying with HAP or VOC content limits by averaging, the Permittee shall maintain documents containing: monthly volume-weighted average values of HAP/VOC content (H_a and G_a), and data/calculations and test results used to calculate H_a and G_a .
- (d) Pursuant to Conditions D.5.1 and D.5.3 and 40 CFR 63.751(c)(1), the Permittee shall maintain a record of the pressure drop readings taken once per shift while the primer or topcoat application operations are occurring.
- (e) To document compliance with Condition D.5.10, the Permittee shall maintain records of visible emission notations of the EU 18 stack exhaust once per shift.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.12 Reporting Requirements [40 CFR 63.753]

- (a) A semi-annual summary of the information to document compliance with Conditions D.5.1 and D.5.3 of this permit shall be submitted to the addresses listed in Section C - General Reporting Requirements, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). This summary shall include information that identify:
 - (1) For uncontrolled primer and topcoat applications that meet organic HAP and VOC content limits without averaging, each value of HAP/VOC content as (H_i and G_i) that exceeds the applicable HAP or VOC content limit specified in 40 CFR 63.745 (c).
 - (2) for uncontrolled primer and topcoat applications complying with HAP or VOC content limits by averaging, each value of H_a and G_a that exceeds the applicable HAP or VOC content limit specified in 40 CFR 63.745 (c).
 - (3) a statement certifying compliance with all requirements of 40 CFR 63, Subpart GG.
- (b) An annual written report to document compliance with Conditions D.5.1(c) shall be submitted to OES including:
 - (1) coatings to be covered under the low usage exemptions D.5.1(b)(9) for the following calendar year,

- (2) the expected volume to be used and the maximum VOC content.
 - (3) The Permittee shall notify OES in writing of any additional coatings added to this list during the calendar year.
- (c) An annual report listing the number of times that the pressure drop for each dry filter system was outside the limits specified by the filter or booth manufacturer. [40 CFR 63.753(c)(2)]

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Specifically regulated insignificant activity:

Four (4) Jet A fuel storage tanks of a capacity of 25,000 gallons or approximately 95 cubic meters, with potential VOC emissions less than 3 pounds per hour and less than 10 tons per year located in the fuel farm on the east side of the maintenance facility.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.1 Record Keeping Requirement [40 CFR Part 60, Subpart Kb][326 IAC 12]

Pursuant to the New Source Performance Standard 40 CFR Part 60.116b Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984, the Permittee shall keep readily accessible records showing the dimension or tank capacities of these jet Storage Tanks. These records shall be kept for the life of the source.

D.6.2 Reporting Requirement [40 CFR Part 60, Subpart Kb][326 IAC 12]

Pursuant to the New Source Performance Standard 40 CFR Part 60.116b Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984, the Permittee shall notify IDEM, OAQ and OES within thirty (30) days when the maximum true vapor pressure of the liquid being stored in any tank exceeds 27.6 kilopascals (kPa). Available data on the maximum true vapor pressure of the liquid being stored shall be in accordance with 40 CFR Part 60.116b(e). The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

The following degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]. These Degreasing operations are located throughout the center.

- (1) Parts Cleaner PW-01
- (2) Parts Cleaner PW-02
- (3) Parts Cleaner PW-03
- (4) Parts Cleaner PW-04
- (5) Parts Cleaner PW-08
- (6) Parts Cleaner currently located in the lower part of hangar 5-A, room 123.
- (7) Parts Cleaner currently located in the lower part of hangar 6-A on the side wall.
- (8) Parts Cleaner currently located in the lower part of hangar 6-A usually situated near the left wing of the aircraft.
- (9) Parts Cleaner PW-11
- (10) Parts Cleaner PW-12
- (11) Parts Cleaner located in the lower part of hangar 7B.
- (12) Parts Cleaner PW-19
- (13) Parts Cleaner in the Non Destructive Testing (NDT) area near the Magnaflux.
- (14) Parts Cleaner AC-10
- (15) Parts Cleaner PW-20
- (16) Parts Cleaner PW-06
- (17) Parts Cleaner PW-09
- (18) Parts Cleaner currently located in the lower cleaning room of hangar 7A
- (19) Parts Cleaner currently located in the upper cleaning room of hangar 7A

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.2 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

The following grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day : [326 IAC 6-3]

- (1) Grit Blast Cabinet BC-01
- (2) Grit Blast Cabinet BC-02
- (3) Grit Blast Cabinet BC-06
- (4) Grit Blast Cabinet BC-07
- (5) Grit Blast Cabinet BC-14
- (6) Grit Blast Cabinet BC-13
- (7) Grit Blast Cabinet BC-09
- (8) Grit Blast Cabinet BC-12
- (9) Grit Blast Cabinet BC-10
- (10) Grit Blast Cabinet BB-01
- (11) Grit Blast Cabinet BB-02
- (12) Grit Blast Cabinet BC-05
- (13) Grit Blast Cabinet BC-15
- (14) Grit Blast Cabinet BC-16
- (15) Grit Blast Cabinet EE-02
- (16) Grit Blast Cabinet PM-01
- (17) Grit Blast Cabinet BC-08
- (18) Grit Blast Cabinet BC-17
- (19) Grit Blast Cabinet BC-18
- (20) Grit Blast Room in the Sheet Metal Shop
- (21) Grit Blast Cabinet BC-03
- (22) Grit Blast Cabinet BC-04

The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21) [326 IAC 6-3]

- (1) The following five emission units located throughout the facility including the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (A) Downdraft Benches
 - (B) ECB Booth
 - (C) Fugitives (Cleaning)
 - (D) Sanding Benches
 - (E) Touchup Booths
- (2) The following three emission units located in the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (A) Cleaning Room
 - (B) Dinol Room
 - (C) Fugitives (Cleaning)

Facility Description [326 IAC 2-7-5(15)]:

Specifically regulated insignificant activity:

- (3) The emission unit identified as hangar 7a with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Those processes are listed above.

Compliance Determination Requirements

D.8.2 Particulate Matter (PM)

In order to comply with D.8.1, the dry filter collection systems for PM control shall be in operation and control emissions from the grit blast cabinets at all times that the grit blast cabinets are in operation.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 EC (100EF) or having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located throughout the Center. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 General Provisions Relating to HAPS [326 IAC 20-1-1][40 CFR 63 Subpart A]

The provisions of 40 CFR Part 63 Subpart A-General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63 Subpart GG, Table 1.

D.9.2 Aerospace NESHAP [40 CFR 63 Subpart GG][326 IAC 20]

This facility is subject to the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities, 326 IAC 20-15, (40 CFR 63.741, Subpart GG).

Cleaning Solvent Type	Composition Requirements
Aqueous.....	Cleaning solvents in which water is the primary ingredient (\$80 percent of cleaning solvent solution as applied must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined along with a variety of additives, such as organic solvents (e.g. high boiling point alcohols.,builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents). Aqueous solutions must have a flash point greater than 93EC (200EF)(as reported by the manufacturer)., and the solution must be miscible with water.
Hydrocarbon Based.....	Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20EC(3.75 in H ₂ O and 68EF). These cleaners also contain no HAP.

- (a) The following housekeeping requirements apply pursuant to 40 CFR 63.744(a) unless the cleaning solvent used is identified in Table 1 of 40 CFR 63.744 (shown above), or contains HAP and VOC below the de minimus levels specified in 40 CFR 63.741(f).
- (1) Pursuant to 40 CFR 63.744(a)(1), the Permittee shall place cleaning solvent-laden cloth, paper, or other absorbent applicators in bags or other closed containers upon completing their use.
 - (2) Pursuant to 40 CFR 63.744(a)(2), the Permittee shall store fresh and spent cleaning solvents (except semi-aqueous) in closed containers.

- (3) Pursuant to 40 CFR 63.744(a)(3), the Permittee shall conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in a way which minimizes spills.
- (b) Except for the cleaning of spray gun equipment performed in accordance with 40 CFR 63.744(c)(3), all hand wipe cleaning solvents must meet the composition requirements identified in Table 1 of 40 CFR 63.744 (above) or have a composite vapor pressure at or below 45 mm Hg at 20 °C.
- (c) For spray gun cleaning operations, the Permittee shall use one of the four specified techniques or their equivalent, pursuant to 40 CFR 63.744(c).
- (d) For enclosed spray gun cleaners, if leaks are found during the monthly inspection, source should repair as soon as practicable, but within 15 days, pursuant to 40 CFR 63.744(c)(1)(ii).
- (e) If cleaning solvent solutions that contain HAP and VOC below the de minimis levels are used, those cleaning operations using such solutions are exempt from the requirements of 40 CFR 63.744(c).
- (f) For flush cleaning operations source must empty used cleaning solvent into enclosed container, collection system, or system with equivalent emission control pursuant to 40 CFR 63.744(d)

Compliance Determination Requirements

D.9.3 Hand Wipe Cleaning [40 CFR 63.749(c)(1)]

An affected hand wipe cleaning operation shall be considered in compliance when all hand wipe cleaning solvents, excluding those used for hand wipe cleaning of spray gun equipment under 40 CFR 63.744(c), meet either the composition requirements specified in 40 CFR 63.744(b)(1) or the vapor pressure requirement specified in 40 CFR 63.744(b)(2).

D.9.4 Spray Gun Cleaning [40 CFR 63.749(c)(2)]

An affected spray gun cleaning operation shall be considered in compliance when each of the following conditions is met:

- (a) One of the four techniques specified in 40 CFR 63.744(c)(1) through(c)(4) is used;
- (b) The technique selected is operated according to the procedures specified in 40 CFR 63.744(c)(1) through (c)(4) as appropriate; and
- (c) If an enclosed system is used, monthly visual inspections are conducted and any leak detected is repaired within 15 days after detection. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shutdown until the cleaner is repaired or its use is permanently discontinued.

D.9.5 Flush Cleaning [40 CFR 63.749(c)(3)]

An affected flush cleaning operation shall be considered in compliance if the operating requirements specified in 40 CFR 63.744(d) are implemented and carried out.

D.9.6 Compliance Test Methods for Cleaning Operations [40 CFR 63.750(a)and(b)]

Permittee shall make composition determinations using manufacturers data [40 CFR 63.750(a)] or a vapor Pressure determination using readily available sources such as MSDS if single component; composite vapor pressure determined by manufacturer's supplied data or ASTM E 260-91 and by equation provided for multiple component solvents. [40 CFR 63.750(b)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.9.7 Monitoring Requirements for Cleaning Operations [40 CFR 63.751(a)]

Permittee shall conduct monthly visual leak inspection for enclosed spray gun cleaners in accordance with requirements of 40 CFR 63.751(a).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.9.8 Record keeping requirements for cleaning operations [40 CFR 63.752(b)]

- (a) Pursuant to 40 CFR 63.752(b)(2), for each cleaning solvent used in hand wipe cleaning operations that complies with the composition requirements specified in 40 CFR 23.744(b)(1) or for semi aqueous cleaning solvents used for flush cleaning operations:
 - (1) The name of each cleaning solvent used;
 - (2) all data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements; and
 - (3) annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
- (b) For each cleaning solvent used in hand wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirements in 40 CFR 63.744(b)(2):
 - (1) The name of each cleaning solvent used;
 - (2) the composite vapor pressure of each cleaning solvent used;
 - (3) all vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
 - (4) the amount (in gallons) of each cleaning solvent used each month at each operation.
- (c) For each cleaning solvent used for the exempt hand wipe cleaning operations specified in 40 CFR 63.744(e) that does not conform to the vapor pressure or composition requirements of 40 CFR 63.744(b):
 - (1) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
 - (2) a list of processes set forth in 40 CFR 63.744(e) to which the cleaning operation applies.
- (d) A record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR 63.751(a) that includes, for each leak found;
 - (1) Source identification;
 - (2) Date leak was discovered; and
 - (3) Date leak was repaired.

D.9.9 Reporting requirements for cleaning operations [40 CFR 63.753(b)]

A semi-annual summary of the information to document compliance with Conditions D.9.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). This summary shall include:

- (a) Statement certifying compliance. [40 CFR 63.753(b)(1)(v)]

- (b) Semiannual report for hand wiping operations' noncompliant cleaning solvent used. [40 CFR 63.753(b)(1)(i)]
- (c) Semiannual report of all new cleaning solvents and their composite vapor pressure or notifications of compliance with composition requirements [40 CFR 63.753(b)(1)(ii)]
- (d) Semiannual report of noncompliant spray gun cleaning method used. [40 CFR 63.753(b)(1)(iii)]
- (e) Leaks from enclosed spray gun cleaners not repaired within 15 days. [40 CFR 63.753(b)(1)(iv)]

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

9	Natural Gas Only
9	Alternate Fuel burned
From: _____	To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS Office of Environmental Services
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
Part 70 Quarterly Report

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156
Facility: All Boilers, All Generators, All Fire Pumps (Emission Units 001-012)
Parameter: Jet A fuel usage
Limit: 4,844,590 gallons per 12 consecutive month period

QUARTER _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE

PART 70 OPERATING PERMIT - EMISSION MONITORING REPORT - CONTINUOUS OPACITY
MONITORING EXCEEDANCE SUMMARY (Part 1)

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

Quarter: _____ Year: _____ Boiler #: _____

Day	Time Period	Opacity % Magnitude	Malfunction (X denotes)		Remarks
			Monitor	Equipment	

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

(Repeat Form as necessary per boiler(s)/COM)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION DATA COMPLIANCE**

**PART 70 OPERATING PERMIT - EMISSION MONITORING REPORT - CONTINUOUS OPACITY
MONITOR EXCEEDANCE SUMMARY (Part 2)**

Source Name: Indianapolis Airport Authority
Source Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Mailing Address: 2500 S. High School Rd., Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

Quarter: _____ Year: _____ Boiler #: _____ Operating Hours: _____

Day	Reason	Occurrences	Total Minutes	6 Minute Occurrence

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

(Repeat Form as necessary per boiler(s)/COM)

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5
- (8) 326 IAC 2-3-1 through 2-3-5;
- (9) 326 IAC 2-4-1 through 2-4-6;
- (10) 326 IAC 2-6-1 through 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1-1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2;
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2;
- (33) 326 IAC 11-2-1 through 11-2-3;
- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;
- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption states that "or the administrator of OES" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption states that "or the administrator of OES" is added in (b)).

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Indianapolis Airport Authority-Indianapolis Maintenance Center
Source Location: 2825 West Perimeter Road, Indianapolis, Indiana 46241
County: Marion
SIC Code: 4581
Operation Permit No.: T097-9602-00156
Permit Reviewer: Holly M. Stockrahm

On January 16, 2003, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star and News, Indianapolis, Indiana, stating that United Airlines (UAL) had applied for a Part 70 Operating Permit to operate an aerospace vehicle maintenance facility. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 13, 2003, United Airlines submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Condition A.2(d) indicates that Boiler #4 exhausts through stack 002. This unit has its own stack, and exhausts through stack 004. The description in D.2 should be revised to reflect this correction (the description in the Technical Support Document (TSD) is correct).

Response to Comment 1:

IDEM and OES agree. The description under A.2(d) and in D.2 have been changed as follows:

Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (MM Btu/hr), using a flue gas recirculation system as control, exhausting to one stack, identified as stack ~~002~~ **004**, installed in 1994.

Comment 2:

Condition A.2(m) identifies four paint booths that are located in support shops, and describes two in the Composite Shop as exhausting to stack 017 and two located in the Machine Shop and Interior Shop as exhausting to Stack 018. There are actually individual stacks for each of these paint booths. The description in D.5 should be revised to reflect this correction.

Response to Comment 2:

IDEM and OES agree. The booths in the Composite Shop exhaust to stacks 017a and 017b, and the booths in the Machine Shop exhaust to stack 018a and the booth in the Interior shop exhaust to stack 018b. The descriptions under A.2(m) and under D.5 have been changed as follows:

Painting and mixing operations including:

- (1) Two (2) paint booths, located in the Composite shop, identified as emission unit 017, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to ~~one~~ **two** stacks ~~017~~ **017a and 017b**, installed in 1995.
- (2) Two (2) paint booths, located in the Machine Shop and the Interior Shop, respectively, identified as emission unit 018, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to ~~one~~ **two** stacks ~~018~~ **018a and 018b**, installed in 2000 and 2001, respectively.

Comment 3:

Condition A.2(o) should contain a reference to hangar 7a (which began operation in 1999) in the table. This change should also be made to the description in the TSD.

Response to Comment 3:

IDEM and OES agree that the table in Condition A.2(o) be modified, however, changes noted here in the TSD addendum track the changes made to the permit only, the TSD serves as a historical record of the document which was placed on public notice. Hangar 7a was constructed in 1999, emits less than 25 tons per year, so is not subject to BACT, but is subject to the NESHAPs based on the major source once in always in requirement of EPA. Compliance with the BACT of the other hangars, serves as compliance with the NESHAPs. Therefore, the table in Condition A.2 (o) has been revised as follows:

- (o) ~~Seven (7)~~ **Eight (8)** service hangars with activities relating to the coating of aircraft parts are identified as emissions unit EU-013, service hangars 1, 2, 3, 5, 6, ~~and 7, and 7a~~ are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVLP) spray applications systems, and all hangars consisting of two enclosed bays. Hangar 4 is an external hangar used for routine and non-routine maintenance. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 4	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996
Hangar 7	July 15, 1997
Hangar 7a	1999

Comment 4:

Condition C.12 requires the use of a calibrated backup CEMS in the event of a breakdown of the primary emissions monitoring equipment that would last four (4) hours or more. UAL does not have a backup monitor with which to sample NOx emission levels in the gas stream, and believes that the requirement to maintain such equipment is overly burdensome and costly. The underlying regulatory requirement to operate a NOx CEMS (40 CFR 60, Subpart Db) requires only that a monitor be available for 75% of the operating days per month. UAL would prefer to monitor boiler operating parameters to ensure that the boiler was operated under normal conditions until such time as the NOx monitor was brought back into service. UAL requests that the condition be revised to be consistent with the monitoring requirements contained in 40 CFR Part 60.

Response to Comment 4:

IDEM and OES agree that the NSPS does not require a back-up CEMS, but the source needs to be aware that the requirements of 326 IAC 3 (Monitoring Requirements) are more stringent. 326 IAC 3 requires continuous monitoring regardless of the requirements of the NSPS. The language of the NSPS does differ from the permit requirements. Condition C.12 and D.2.11 under compliance determination for the boilers have been changed as follows:

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) ~~Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.~~
- ~~(d)~~ Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 60, Subpart Db.

D.2.11 Continuous Emissions Monitoring System (CEMS) for Nitrogen Oxides (NOx) [326 IAC 3-5][40 CFR 60 Subpart Db]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11 [40 CFR 60, Subpart Db), a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring nitrogen oxides from boilers 003 and 004, which meets the performance specifications
- (b) **When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring**

systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

Comment 5:

Condition C.13 requires the use of a calibrated backup COM to record opacity readings in the event of a malfunction of any continuous opacity monitor (COM) that would last four (4) hours or more. UAL does not have a backup monitor with which to monitor opacity levels in the gas stream, and believes that the requirement to maintain such equipment is overly burdensome and costly. The underlying regulatory requirement to operate a COM (40 CFR 60, Subpart Db) requires only that a monitor be available for 75% of the operating days per month. UAL does not believe that the use of a backup COM is necessary while burning Jet Fuel, since Jet Fuel burns cleanly. As an alternative, UAL suggests the use of "trained employees" (as defined under Condition D.1.9) to periodically observe whether the stack appears normal or abnormal. In the event that a stack appeared abnormal, formal visible emission readings could then be collected.

Response to Comment 5:

IDEM and OES disagree. Condition C.13 states that a backup COM shall be brought online if possible, if not, visible emissions reading shall be taken. The NSPS does not specifically state the contingencies for the COM. There is no change to the permit as a result of this comment.

Comment 6:

It is not clear to UAL whether the Title V (TV) permit as currently proposed (which allows the combustion of Jet A fuel) would allow fuel generated from draining Jet A Fuel from the fuel tanks of planes being serviced to be burned in the Boiler#1. This fuel is for the most part identical to virgin Jet A fuel, however, FAA regulations preclude it from being reintroduced to planes as a safety precaution. Under Section D.1, in all conditions relating to the combustion of Jet A fuel in Boiler #1, UAL wishes to clarify that references to Jet A Fuel should be revised to include off-spec Jet A fuel as well.

Response to Comment 6:

IDEM and OES agree that Jet A fuel drained from fuel tanks can be termed Off-Spec Jet A fuel. The combustion of this off-spec fuel would not impact air pollution emissions for Boiler #1. The proposed Title V permit references to Jet A Fuel shall be revised to include Off-Spec Jet A Fuel. The description under A.2, D.1, Conditions D.1.4, D.1.6, and D.1.10 have been changed as follows:

- A.2 Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel **or off-spec Jet A fuel**, with a maximum heat input capacity of 12.6 million British thermal units (MM Btu/hr), using a flue gas recirculation system as control, exhausting to one stack, identified as stack 001, installed in 1993.
- D.1 Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel **or off-spec Jet A fuel**, with a maximum heat input capacity of 12.6 million British thermal units (MM Btu/hr), using a flue gas recirculation system as control, exhausting to one stack, identified as stack 001, installed in 1993.

Boiler #2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 25.2 MM Btu/hr, using

a flue gas recirculation system as control, exhausting to one stack, identified as stack 002, installed in 1993.

D.1.4 Sulfur Dioxide (SO₂) Limitations [326 IAC7-1.1-1] [40 CFR 60.42c(d)][326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) While burning Jet A fuel (**or off-spec Jet A fuel in Boiler #1**), the SO₂ emissions from each of the 12.6 or 25.2 MM Btu per hour boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the Jet A fuel **or Jet A off-spec fuel** shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (c) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.
- (d) Pursuant to 40 CFR 60.42b(j), the Permittee shall ensure that the Jet A fuel **or Jet A off-spec fuel** used meets the definition of a “very low sulfur oil,” meaning oil that contains no more than 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu.

D.1.6 Restrictions on Fuel Usage and Sulfur Contents [326 IAC 2-3][CP096-00156-01]

- (a) Pursuant to CP CP096-00156-01, issued November 25, 1996, the Permittee shall limit the combustion of Jet A fuel **and/or Jet A off-spec fuel** as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The fuel usage limitations under D.1.6 (which includes boilers under section D.2), D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.

Facilities	Jet A Fuel and Off-Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MM Btu per hour boilers combined	4,725,730

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

- (b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel (**and off-spec Jet A Fuel**) to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1, 40 CFR 60.42b(j), and 326 IAC 12 specified under Condition D.1.3. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual Jet A fuel **and off-spec Jet A fuel** usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel.

Comment 7:

Condition D.1.5 should have the words “of the” between the words each and boilers in the first sentence.

Response to Comment 7:

IDEM and OES agree. Condition D.1.5 has been changed as follows:

D.1.5 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from each **of the** boilers shall be limited to 0.423 pounds per MM Btu heat input.

Comment 8:

Condition D.1.8 establishes sulfur sampling for Boilers #1 and #2. As noted above, UAL wishes to burn off-spec Jet A fuel in Boiler #1 that is generated through the collection of fuel from planes that are undergoing maintenance. As currently worded, the permit would require that UAL conduct a sulfur sample each time fuel was added to the storage tank. UAL would like to modify the sulfur sampling requirements contained in the TV permit for this fuel. UAL plans to have one storage tank that would be dedicated to this fuel. Because small quantities of this fuel would be added to this tank on a frequent basis (and there is no “supplier” data on the fuel) the permit would require sampling be performed each time fuel was added. The cost to perform such testing makes the option of combusting this fuel economically infeasible. UAL can provide general vendor data of original Jet A Fuel purchased throughout the UAL System that demonstrates Jet A fuel has consistently had a sulfur content of less than 0.1 percent since the facility began operating in 1994. Jet A fuel has historically had a sulfur content of less than 0.1%, which is well below the NSPS limit of 0.5% and the permit limit of 0.28%. UAL proposes to collect weekly samples from the tank and perform analyses of quarterly composite samples to demonstrate compliance with the sulfur sampling requirements of the permit for this fuel. UAL requests that the language of the permit be revised to reflect this sampling procedure.

Response to Comment 8:

IDEM and OES agree that the SO₂ in the fuel drained from the fuel tanks should not significantly differ from the virgin fuel, therefore, the vendor data for the virgin fuel would be sufficient to meet the requirements under D.1.8 (a) and an analysis of the fuel oil would not be necessary. There is no change to the permit as a result of this comment.

Comment 9:

Condition D.1.9 requires visible emissions notations while burning Jet A fuel in boilers #1 or #2. The uncontrolled particulate matter emissions from each of these units are less than one tons per year at maximum capacity while burning Jet A fuel. UAL questions the need to perform visual emission notations on a source with such low potential particulate matter emissions, and requests the requirement to perform visible emission notations be deleted.

Response to Comment 9:

IDEM and OES do not agree. The requirement of performing once per shift visible emission notations when a boiler is burning Jet A or Off-spec Jet A fuel oil is used to indicate that the source is in compliance with 326 IAC 5-1 and 326 IAC 6, and 40 CFR 60, Subpart Dc and to indicate to the source whether or not a problem exists in the operation. The natural gas certification is used in lieu of once per shift visible emissions notations, for when the boilers are burning natural gas. No has been made to this permit as a result of this comment.

Comment 10:

Condition D.1.10(c) should have the phrase “burning Jet A fuel” added to the end of the condition.

Response to Comment 10:

IDEM and OES agree, and off-spec Jet A fuel should be added as well. Condition D.1.10 (c) has been changed as follows:

- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the EU1 and EU2 stack exhaust while burning **Jet A or off-spec Jet A fuel**.

Comment 11:

Condition D.1.11 outlines reporting requirements for Boilers #1 and #2. Under the requirements of this condition, there are two different reporting requirements. The first is a “natural gas-fired boiler certification” that requires certification of all fuels combusted, and is to be submitted semiannually. The second is a summary of Jet A fuel use, and is to be filed quarterly. UAL believes that these reporting requirements are repetitious, and believes that only one should be necessary. UAL suggests that the natural gas-fired boiler certification” requirement be eliminated, since the quarterly Jet A fuel use summary will provide a summary of Jet A fuel use each quarter.

Response to Comment 11:

IDEM and OES disagree. Combustion of natural gas results in negligible PM emissions and, therefore, no visible emissions monitoring is required. Certifying when natural gas is used allows the source to account for the time that visible emissions monitoring is not performed. Visible emissions monitoring is required while combusting Jet A or off-spec Jet A fuel. The reporting of the fuel usage is to

ensure that the source is not exceeding permitted limits. There is no change to the permit as a result of this comment.

Comment 12:

Condition D.2.10(a)(2)(B) should have the word "or" deleted at the end of the sentence.

Response to Comment 12:

IDEM and OES disagree. Compliance can be determined under 326 IAC 3-7-4 by providing vendor analysis, or testing the fuel, or under 326 IAC 3-6 by stack testing. There is no change to the permit as a result of this comment.

Comment 13:

Condition D.2.13(b) should refer to Condition D.2.4 instead of Condition D.2.5.

Response to Comment 13:

IDEM and OES agree. Condition D.2.13(b) has been changed as follows:

D.2.13 NOx Readings

- (b) Appropriate response steps shall be taken in accordance with Section C.18 - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the Nitrogen Oxides exceed 0.1 pounds per million Btu, determined on a 30 day rolling average basis, when combusting Natural Gas as indicated in Condition ~~D.2.4~~ **D.2.5**. Failure to take response steps in accordance with Section C.18 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 14:

Condition D.5.3 notes that even though it has been determined that UAL is not a major source of HAP emissions, that the aerospace Maximum Achievable Control Technology (MACT) standard is still applicable. UAL understands the MACT applicability criteria that once a source is a major source for HAPs it is always considered a major source, even if its emissions are reduced below major source thresholds. In this instance, however, UAL was erroneously classified as a major source, and is now correctly classified as a minor source of HAPs. UAL believes that the Title V permit should be revised to indicate that UAL is not classified as a major source of HAPs.

Response to Comment 14:

IDEM and OES disagree. UAL submitted notification to EPA that they were a major source of HAPs based on calculations. Additionally, there was no enforceable permit limit in place prior to the first substantive compliance date, so that the MACT, 40 CFR 63, Subpart GG, would not apply. The source currently emits below the level of a major source of HAPs but is still subject to 40 CFR 63, Subpart GG. Once a source is subject to a MACT, the source will remain subject even if the emissions fall below the major threshold levels. On September 11, 2000, Janet McCabe receive a response to a letter from EPA concerning this matter. The letter determined that the Aerospace MACT does apply because the source, firstly, did not have federally enforceable limits by the promulgation date of the regulation, secondly, the letter dating April 30, 1999, requesting that the source be considered non major was

received after many of the hangars were constructed and were operated, and thirdly, that we do not have sufficient information to determine when the source began to use compliant coatings, and therefore, when actual emissions were less than threshold levels. There is no change to the permit as a result of this comment.

Comment 15:

Conditions D.5.12 and D.9.9 require the submission of semiannual summaries of certain data as required under 40 CFR 63, Subpart GG. Under these requirements, these reports are to be submitted "within 30 days of the end of the six month period being reported". Condition C.22(e) states that "reporting periods are based on calendar years". UAL assumes that the reports required under D.5.8 and D.9.9 are to cover the periods January 1 through June 30, and July 1 through December 31 of each year. Is this correct?

Response to Comment 15:

Pursuant to 40 CFR 63, Subpart GG, the periods covered by report are each six month period dating from the date of the initial notification. However, it is acceptable to change the period reported to cover the periods January 1 through June 30, and July 1 through December 31 of each year in order to be consistent with the rest of the reporting requirements. There should be no gap in the months being reported, so an overlap of one reporting period may be necessary. For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

- (1) Anniversary date of initial date of compliance through the subsequent 6 months.
(Example: November 21, 1997 through May 20, 1998)
- (2) Next six months.
(Example: May 21 through November 30, 1998)
- (3) Remaining months of the year.
(Example: December 1 through December 31, 1998)

Comment 16:

The Technical Support Document contains descriptions for boiler #3 and #4 that indicate that these units use "a flue gas circulation system as PM control". UAL wishes to clarify that the flue gas circulation system is utilized for NOx control.

Response to Comment 16:

The comment is noted here and the permit boiler descriptions have been changed as follows:

Facility Description [326 IAC 2-7-5(15)]:

Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 12.6 million British thermal units (MM Btu/hr), using a flue gas recirculation system as **NOx** control, exhausting to one stack, identified as stack 001, installed in 1993.

Boiler #2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 25.2 MM Btu/hr, using a flue gas recirculation system as **NOx** control, exhausting to one stack, identified as stack 002,

installed in 1993.

Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (MM Btu/hr), using a flue gas recirculation system as **NOx** control, exhausting to one stack, identified as stack 003, installed in 1994.

Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (MM Btu/hr), using a flue gas recirculation system as **NOx** control, exhausting to one stack, identified as stack 004, installed in 1994.

IDEM, OAQ and OES have made the following changes:

1. The citation on Condition D.3.1 has been expanded to include the CP citation [CP 960156-01].
2. The citation on Condition D.6.1 and D.6.2 have been expanded to include [326 IAC 12].
3. The table of contents has been revised.
4. On May 8, 2003, IDEM and OES received a request for an Administrative Amendment to the Part 70 permit from United Airlines. United Airlines has requested that the Part 70 permit be administratively amended to reflect a change of ownership to the Indianapolis Airport Authority as of 12:01 am on 10 May 2003. The new name and address is Indianapolis Airport Authority, 2500 South High School Road, Indianapolis, IN 46241, with a contact of Todd Cavender, Environmental Manager, and a responsible official of the Airport Director (curr. There will be no change in operations or in emissions resulting from this change. There will be no change in applicable requirements as a result of this change. No permit terms and/or conditions will be required to implement this change. A schedule of compliance is not required. A certification signed by UAL as well as a certification signed by the Indianapolis Airport Authority was completed and attached to the request. The source information on the Part 70 permit and the responsible official information have been changed accordingly.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: United Airlines
Source Location: Indianapolis Maintenance Center
2825 West Perimeter Road, Indianapolis, Indiana 46241
County: Marion
SIC Code: 4581
Operation Permit No.: T097-9602-00156
Permit Reviewer: Holly M. Stockrahm

The Indiana Department of Environmental Management, Office of Air Quality, and the City of Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 permit application from United Airlines relating to the operation of an aerospace vehicle maintenance facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Boiler #1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 12.6 million British thermal units per hour (mmBtu/hr), using a flue gas recirculation system as particulate matter (PM) control, installed in 1993, and exhausting out one stack identified as stack 001.
- (b) Boiler #2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 25.2 million British thermal units per hour (mmBtu/hr), using a flue gas recirculation system as PM control, installed in 1993, and exhausting to one stack, identified as stack 002.
- (c) Boiler #3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (mmBtu/hr), using a flue gas recirculation system as PM control, installed in 1994, and exhausting to one stack, identified as stack 003.
- (d) Boiler #4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas or Jet A fuel, with a maximum heat input capacity of 122 million British thermal units per hour (mmBtu/hr), using a flue gas recirculation system as PM control, installed in 1994, and exhausting to one stack, identified as stack 004.
- (e) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 005, and installed in 1993.

- (f) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.
- (g) Emergency Generator #3, manufactured by Cummins, model number KTA39-G4, identified as emission unit 007, fired with Jet A fuel, with a maximum horse power rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.
- (h) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.
- (i) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel, with maximum horse power rating of 480, exhausted out one stack identified as stack 009, and installed in 1993.
- (j) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 010, and installed in 1993.
- (k) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 011, and was installed in 1993.
- (l) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel, with a maximum horse power rating of 480, exhausted out one stack identified as stack 012, and was installed in 1993.
- (m) Painting and mixing operations including:
 - (1) Two (2) paint booths, located in the Composite shop, identified as emission unit 017, using high volume low pressure (HVL) spray application systems, with dry filters for particulate matter control, exhausting to one stack 017, installed in 1995.
- (o) Seven (7) service hangars with activities relating to the coating of aircraft parts are identified as emissions unit EU-013, service hangars 1, 2, 3, 5, 6, and 7 are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVL) spray applications systems, and all hangars consisting of two enclosed bays. Hangar 4 is an external hangar used for routine and non-routine maintenance. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 4	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996
Hangar 7	July 15, 1997

Unpermitted Emission Units and Pollution Control Equipment

- (a) Painting and mixing operations including:
 - (1) Two (2) paint booths, located in the Machine Shop and the Interior Shop, respectively, identified as emission unit 018, using high volume low pressure (HVLP) spray application systems, with dry filters for particulate matter control, exhausting to one stack 018, installed in 2000 and 2001, respectively.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:
 - 1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - 2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) The following degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]. These Degreasing operations are located throughout the center.
 - (1) Parts Cleaner PW-01
 - (2) Parts Cleaner PW-02
 - (3) Parts Cleaner PW-03
 - (4) Parts Cleaner PW-04
 - (5) Parts Cleaner PW-08
 - (6) Parts Cleaner currently located in the lower part of hangar 5-A, room 123.
 - (7) Parts Cleaner currently located in the lower part of hangar 6-A on the side wall.
 - (8) Parts Cleaner currently located in the lower part of hangar 6-A usually situated near the left wing of the aircraft.
 - (9) Parts Cleaner PW-11
 - (10) Parts Cleaner PW-12
 - (11) Parts Cleaner located in the lower part of hangar 7B.
 - (12) Parts Cleaner PW-19
 - (13) Parts Cleaner in the Non Destructive Testing (NDT) area near the Magnaflux.
 - (14) Parts Cleaner AC-10
 - (15) Parts Cleaner PW-20
 - (16) Parts Cleaner PW-06
 - (17) Parts Cleaner PW-09
 - (18) Parts Cleaner currently located in the lower cleaning room of hangar 7A
 - (19) Parts Cleaner currently located in the upper cleaning room of hangar 7A

- (h) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located throughout the Center. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (j) Closed loop heating and cooling systems.
- (k) Infrared cure equipment.
- (l) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.
- (m) Any of the following structural steel and bridge fabrication activities: Cutting 200,00 linear feet or less of one inch (1") plate or equivalent. Using 80 tons or less of welding consumables.
- (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (o) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (p) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (q) Noncontact cooling tower systems with either of the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
- (r) Quenching operations used with heat treating processes.
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (t) Heat exchanger cleaning and repair.
- (u) Process vessel degassing and cleaning to prepare for internal repairs.
- (v) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3]
- (w) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (x) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (z) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (aa) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower.
 - (2) Diesel generators not exceeding 1600 horsepower.
- (bb) The following grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day : [326 IAC 6-3]
 - (1) Grit Blast Cabinet BC-01
 - (2) Grit Blast Cabinet BC-02
 - (3) Grit Blast Cabinet BC-06
 - (4) Grit Blast Cabinet BC-07
 - (5) Grit Blast Cabinet BC-14
 - (6) Grit Blast Cabinet BC-13
 - (7) Grit Blast Cabinet BC-09
 - (8) Grit Blast Cabinet BC-12
 - (9) Grit Blast Cabinet BC-10
 - (10) Grit Blast Cabinet BB-01
 - (11) Grit Blast Cabinet BB-02
 - (12) Grit Blast Cabinet BC-05
 - (13) Grit Blast Cabinet BC-15
 - (14) Grit Blast Cabinet BC-16
 - (15) Grit Blast Cabinet EE-02
 - (16) Grit Blast Cabinet PM-01
 - (17) Grit Blast Cabinet BC-08
 - (18) Grit Blast Cabinet BC-17
 - (19) Grit Blast Cabinet BC-18
 - (20) Grit Blast Room in the Sheet Metal Shop
 - (21) Grit Blast Cabinet BC-03
 - (22) Grit Blast Cabinet BC-04
- (cc) Filter or coalescer media change out.
- (dd) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (ee) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (ff) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21) [326 IAC 6-3]
 - (1) The following five emission units located throughout the facility including the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (A) Downdraft Benches
 - (B) ECB Booth
 - (C) Fugitives (Cleaning)
 - (D) Sanding Benches
 - (E) Touchup Booths

- (2) The following three emission units located in the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (A) Cleaning Room
 - (B) Dinol Room
 - (C) Fugitives (Cleaning)
- (3) The following two emission units located in the Sidewall/Ceiling Shop of the Interior Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
 - (A) Drawdown Bench for Vacuum mold
 - (B) Floorboard Router
- (4) One Tank Line located in the Surface Application area of the Machine Shop with potential VOC emissions less than 3 pounds per hour and potential HAP emissions less than 1 ton per year.
- (5) Four (4) Jet A fuel storage tanks of a capacity of 25,000 gallons or approximately 95 cubic meters, with potential VOC emissions less than 3 pounds per hour and less than 10 tons per year located in the fuel farm on the east side of the maintenance facility.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Construction Permit CP096-00156-01, issued November 25, 1996. This permit was issued for the entire source and replaces the initial construction permit CP094-00156-01 issued in 1994.
- (b) Affidavit of construction for hangar 7 received on June 15, 1997.

All conditions from previous approvals were incorporated into this Part 70 permit except for the following:

- (a) All references to Boiler 1 as being a 10.24 mmBtu/hr boiler were corrected to refer to this emission unit as a 12.6 mmBtu/hr boiler. This was not a replacement boiler. All emissions calculations will reflect this corrected capacity.
- (b) All references to Boiler 2 as being a 20.49 mmBtu/hr boiler were corrected to refer to this emission unit as a 25.2 mmBtu/hr boiler. This was not a replacement boiler. All emissions calculations will reflect this corrected capacity.
- (c) All references to boilers 3 and 4 (Emission Units 3 and 4) as being 106 mmBtu/hr boilers were corrected to refer to these emission units as 122 mmBtu/hr boilers. These were not replacement boilers. All emissions calculations will reflect these corrected capacities.
- (d) Conditions outlined in 15.f were amended to specify that small aerosol spray paint cans are not included.
- (e) All references to 326 IAC 2-1 were amended to refer to 326 IAC 2-1.1
- (f) CP096-00156-01, issued November 25, 1996, Condition 9 requirement that particulate limits for the 12.6, 25.2 and two 122 million BTU/hour boilers are no longer limited to 0.15 pounds per million BTU when combusting Jet A fuel pursuant 326 IAC 6-1-2 (b)(4) and 0.01 grains per dry standard cubic foot when burning Natural Gas pursuant to 326 IAC 6-1-

2(b)(5) since the actual PM emissions do not exceed 10 tons per year for the entire source and potential PM emissions do not exceed 100 tons per year for the entire source. There was an error in rule applicability in the previous construction permit. Additionally, these boilers do not have particulate matter limits listed under 326 IAC 6-1-12.

- (g) CP096-00156-01, issued November 25, 1996, the Condition 13 requirement to estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO₂ emission limitations and to keep records of this usage was eliminated because when calculated using worst case natural gas usage, the SO₂ emissions are negligible. Therefore, no equivalent limit is needed.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 27, 1996. A notice of completeness letter was mailed to the source on December 9, 1996. Additional information was received on the following dates:

- (a) The following startup dates:
 - (1) Startup date for an additional paint booth located in the machine shop area, scheduled to be started on September 2, 1999. Paint booth was an insignificant activity.
 - (2) Startup date for an additional grit blasting machine located in the machine shop area, scheduled to be started on August 18, 1999. Grit blasting machine was an insignificant activity.
- (b) The Permittee submitted initial notification report of 40 CFR 63 Subpart GG Applicability on August 14, 1997.
- (c) Request for an equivalency determination for a spray gun cleaning technique not listed in 40 CFR 63.744(c) received on August 19, 1997. EPA determined that equivalency determination was not necessary because hand wiping of spray gun parts was covered by hand wiping techniques, in an e-mail submitted on 1/23/98.
- (d) The Permittee requested on March 3, 1997 that many exemptions listed in Permit CP-096-00156-01 Condition 15.b be extended to apply to Condition 15.f, more specifically, that conditions pertaining to High Volume, Low Pressure (HVLP) and/or touch up gun technology not apply to the use of small aerosol spray can coating.
- (e) The boiler capacity determinations received on January 28, 1998 stated that heat input capacity for boiler 001 was actually 12.6 mmBtu/hr instead of 10.24 mmBtu/hr. It stated that the heat input capacity for boiler 002 was actually 25.2 mmBtu/hr instead of 10.49 mmBtu/hr. It also stated that the heat input capacity for boilers 003 and 004 were actually 122 mmBtu/hr each instead of 106 mmBtu/hr each. The revised information corrected the heat input previously submitted.
- (f) Applicability determination was issued by EPA on May 29, 1998 stating that Jet A fuel is an "oil" within the meaning of NSPS Subpart Db.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential Emissions (tons/year)
PM	Less than 100
PM-10	Less than 100
SO ₂	Greater than 250
VOC	Greater than 100
CO	Greater than 100
NO _x	Greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Single HAPs	Less than 10 tons per year
Combination of HAPs	Less than 25 tons per year

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of SO₂, VOC, CO and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data for the criteria air pollutants. The data for HAP emissions was taken from United Air Lines Maintenance Facilities Part 70 Application.

Pollutant	Actual Emissions (tons/year)
PM	1
PM-10	0.94
SO ₂	0.61
VOC	26.79
CO	4.85
NO _x	22.70
Methyl Ethyl Ketone	2.04
Toluene	0.92
Xylene	0.23
Methyl Isobutyl ketone	0.32
Chromium Compounds	0.52
Hexamethylene DIISACYNATE	0.01
Methyl Chloroform	0.95

Phenol	0.08
Methylbenzene	< 0.01
Ethylene Glycol	< 0.01
Methylene Chloride	0.41
Methanol	0.01
Total Combined HAP	5.49

Potential to Emit After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler #1 (Emission Unit 001)	0.2 (1)(2)	0.4	99(3)	0.3	4.6	2.1 (4)	0.1
Boiler #2 (Emission Unit 002)	0.4(1)(2)	0.8		0.6	9.3	4.2 (4)	0.2
Boiler #3 (Emission Unit 003)	2(1)(2)	4.1		2.9	44.9	53.4 (4)	0.5
Boiler #4 (Emission Unit 004)	2 (1)(2)	4.1		2.9	44.9	53.4 (4)	0.5
Emergency Generator #1 (Emission Unit 005)	0.25	0.14		0.5	4.0	1.1	<0.1
Emergency Generator #2 (Emission Unit 006)	0.25	0.14		0.5	4.0	1.1	<0.1
Emergency Generator #3 (Emission Unit 007)	0.25	0.14		0.5	4.0	1.1	<0.1
Fire Pump Engine #1 (Emission Unit 008)	0.04	0.04		0.1	0.12	0.56	<0.1
Fire Pump Engine #2 (Emission Unit 009)	0.04	0.04		0.1	0.12	0.56	<0.1
Fire Pump Engine #3 (Emission Unit 010)	0.04	0.04		0.1	0.12	0.56	<0.1
Fire Pump Engine #4 (Emission Unit 011)	0.04	0.04		0.1	0.12	0.56	<0.1
Fire Pump Engine #5 (Emission Unit 012)	0.04	0.04		0.1	0.12	0.56	<0.1
Coating Operations (Emission Units 013, 017, 018)	21(7)	21(7)	0	94.77 (5)			3.39
Total Emissions	25.6	31.02	99	102.64	116.3	119.2	5.49 (6)

(1) Pursuant to Condition 9 of construction permit 096-0156-01 and 323 IAC 6-1-2(b)(4), the PM emissions when burning Jet A fuel are limited to 0.15 pounds per million Btu.

(2) Pursuant to Condition 9 of construction permit 096-0156-01 and 323 IAC 6-1-2(b)(5), the PM

emissions when burning Natural Gas are limited to 0.01 grains per dry standard cubic foot.

- (3) Pursuant to Conditions 10 and 13 of construction permit 096-0156-01, the sulfur content of Jet A fuel was limited to 0.28% and the amount of Jet A fuel combusted was limited such that the total SO₂ emissions plant wide were less than 100 tons per year such that the Emissions Offset rule, 326 IAC 2-3 did not apply. Subsequent to 1996, USEPA reclassified Marion County as Maintenance Attainment for SO₂. The Permittee opted to retain the fuel usage.
- (4) Pursuant to Condition 12 of construction permit 096-0156-01 and 40 CFR Part 60 Subpart Db, the emissions of Oxides of Nitrogen shall be limited to 0.1 pounds per million Btu when combusting Natural Gas.
- (5) Pursuant to condition 15 of construction permit 096-0156-01 and 326 IAC 8-1-6, the emissions of VOC has been limited by the application Best Available Control Technology (BACT). BACT has been established limitations on the VOC content of coating and requirements for transfer efficiency.
- (6) The Permittee submitted an initial notification to EPA that they were a major source of HAPs, although subsequent calculations of HAPs showed that they were not major, EPA made a determination that once actual emissions of HAPs exceed major source thresholds, a source can never become minor even if the actual emissions fall below the thresholds at a later date.
- (7) The particulate matter emissions were based on calculations submitted by the applicant which have been verified.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	Maintenance Attainment
NO ₂	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, SO₂, NO_x, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers 001, 002, 003, and 004 described in this section except when otherwise specified in 40 CFR 60, Subpart D.

- (b) The two 122 mmBtu per hour boilers identified as emission units 003 and 004, are subject to the New Source Performance Standard (40 CFR 60.40b, Subpart Db) and 326 IAC 12, since these boilers each have a heat input capacity greater than 100 mmBtu per hour and were installed after June 19, 1984.
- (1) Pursuant to 40 CFR 60.44b(a), the emissions of nitrogen oxides (NO_x) for the 122 mmBtu per hour boilers shall be limited to 0.2 pounds per million Btu when combusting natural gas or jet fuel. Pursuant to 40 CFR Part 44b(h) the nitrogen oxide standard applies at all times including startup, shutdown and malfunctions. Pursuant to 40 CFR Part 44b(i), compliance with this emissions limitation shall be determined on a 30 day rolling average basis.
 - (2) Pursuant to 40 CFR 60.46b(e), the Permittee shall conduct an initial performance test while combusting natural gas as required under 40 CFR 60.8 using a continuous system for monitoring nitrogen oxides under 40 CFR 60.48(b). The initial performance test was first performed on the uncontrolled boilers on May 23-25, 1995 and NO_x emissions were found to be out of compliance. Flue gas recirculation systems were installed on both boilers in 1996. The second performance test for No. 4 Boiler was performed February 20, 1996 and NO_x emissions were in compliance. The second performance test for No. 3 Boiler was performed October 3, 1996 and NO_x emissions were in compliance.
 - (3) Pursuant to 40 CFR 60.48b(b), the Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring nitrogen oxide emissions discharged to the atmosphere and record the output of the system.
 - (4) Pursuant to 40 CFR 60.48b(c), the continuous emissions monitoring system shall be operated and data recorded during all periods of operation of the affected facility when burning natural gas except for continuous monitoring system breakdowns and repairs.
 - (5) Pursuant to 40 CFR 60.48b(d), the 1-hour average nitrogen oxide emission rates measured by the continuous nitrogen oxide monitors required shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least 2 data points must be used to calculate each 1-hour average.
 - (6) Pursuant to 40 CFR 60.48b(e), the procedures under 40 CFR Part 60.13 shall be followed for installation, evaluation and operation of the continuous monitoring systems. The span value for natural gas and jet fuel shall be 500 ppm.
 - (7) Pursuant to 40 CFR 60.48b(f), when nitrogen oxide emissions data is not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data will be obtained by using standby monitoring systems, Method 7, Method 7A or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.
 - (8) Pursuant to 40 CFR 60.43b(f), the opacity from the two 122 mmBtu per hour boilers shall not be in excess of 20% opacity except for one 6-minute period per hour of not more than 27 percent opacity. This opacity limit only applies when combusting fuel oil (Jet A fuel). Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS Subpart Db. (See Appendix B) Pursuant to 40 CFR 60.46b(g) the opacity standard shall apply at all times

except during periods of startup, shutdown or malfunction.

- (9) Pursuant to 40 CFR 60.46b(d), the Permittee conducted an initial performance test as required under 40 CFR 60.8 to determine compliance with this opacity limitation. Pursuant to 40 CFR 60.46b(7), compliance with the opacity limit shall be based on 40 CFR Appendix A Method 9. The Permittee performed the initial opacity test on May 22, 1995.
- (10) Pursuant to 40 CFR 60.48b(a), the Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring opacity.
- (11) Pursuant to 40 CFR 60.41b, "very low sulfur oil" is defined as an oil that contains no more than 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu. Pursuant to 40 CFR 60.42b(j), the Permittee shall demonstrate that the oil meets this definition by maintaining fuel receipts as described in 40 CFR 60.49b(r). Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS Subpart Db.
- (12) Pursuant to 40 CFR 60.49b, the Permittee conduct the following record keeping and reporting:
 - (A) Pursuant to 40 CFR 60.49b(a), the Permittee submitted notification of the initial startup, as provided in 40 CFR 60.6. The Permittee submitted notification on April 1995.
 - (B) Pursuant to 40 CFR 60.49b(b), the Permittee submitted the performance test data from the initial performance test and the performance evaluation of the CEMs using the applicable performance specifications in appendix B. The Permittee submitted the data from the initial tests performed in June 1995.
 - (C) Pursuant to 40 CFR 60.49b(d), the Permittee shall record and maintain daily records of the amount of natural gas and Jet A fuel combusted per day. Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS Subpart Db. (See Appendix A)
 - (D) Pursuant to 40 CFR 60.49b(f), the Permittee shall maintain records of opacity.
 - (E) Pursuant to 40 CFR 60.49b(g), the Permittee shall maintain records of the following information for each steam generating day:
 - (i) Calendar date
 - (ii) The average hourly nitrogen oxide emission rates (expressed as NO₂) (ng/J or lbs/million Btu heat input) measured or predicted.
 - (iii) The 30-day average nitrogen oxide emission rates (ng/J or lbs/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
 - (iv) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
 - (v) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including the reasons for not

- obtaining sufficient data and a description of corrective action taken.
 - (vi) Identification of the times when emissions data have been excluded from the calculations of average emission rates and the reason for excluding the data.
 - (vii) Identification of "F" factor used for calculations, method of determination, and the type of fuel combusted.
 - (viii) Identification of the when the pollutant concentration exceeded the full span of the continuous monitoring system.
 - (ix) Description of any modifications of the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with performance specifications 2 or 3.
 - (x) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1.
- (F) Pursuant to 40 CFR 60.49b(h), the Permittee is required to submit excess emissions reports for the opacity and nitrogen oxide standards for each calendar quarter during which there are excess emissions from the affected facilities. If there are no excess emissions during the calendar quarter, the Permittee shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period.
- (G) Pursuant to 40 CFR 60.49b(i), the Permittee shall submit a quarterly report of the information required in 40 CFR 60.49(g) (item 5 above)
- (H) Pursuant to 40 CFR 60.49b(j), the Permittee shall submit a quarterly report certifying that only very low sulfur fuel oil was combusted in the affected facility for the preceding quarter.
- (c) The 12.6 and 25.2 mmBtu per hour boilers, 001 and 002, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc). This regulation applies to the 12.6 and 25.2 mmBtu per hour boilers since these boilers have heat input capacity greater than 10 mmBtu per hour but less than 100 mmBtu per hour and were installed after June 9, 1989.
- (1) Pursuant to 40 CFR 60.42c(d), the Permittee shall not combust oil in the 12.6 and 25.2 mmBtu per hour boiler that causes to be discharged to the atmosphere any gases that contain SO₂ in excess of 215 ng/J (0.5 pounds per million Btu) heat input; or as an alternative, the Permittee shall not combust oil in the affected facilities which has a sulfur content greater than 0.5 percent by weight. Pursuant to 40 CFR 60.42c(i).
 - (2) The Permittee may document compliance with 40 CFR 60.42c(d) using the procedures specified in either 40 CFR 60.46c(d)(2) or 40 CFR 60.46c(e):
 - (A) Pursuant to 40 CFR 60.42c(e), the Permittee may demonstrate compliance with 40 CFR 60.42c based on fuel supplier certifications as described in 40 CFR 60.42c(f).
 - (B) Pursuant to 40 CFR 60.42c(d)(2), the Permittee may demonstrate compliance with 40 CFR 60.42c based on sampling and analysis of the oil sample to determine the sulfur content. The Permittee shall collect fuel oil sample as follows;
 - (i) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Fuel oil sample shall be analyzed for the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19. Results of the fuel oil analysis taken after each new shipment of oil is received shall be used to calculate the 30 day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 percent by weight, the Permittee shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less.

- (3) Pursuant to 40 CFR 60.43c, the particulate standards apply to steam generating units with a heat input capacity of 30 mmBtu/hr or greater. Consequently the particulate standard under 40 CFR 60.43c does not apply to the 12.6 and 25.2 mmBtu per hour boilers.
- (4) Pursuant to 40 CFR 60.48c(d) and (e), the Permittee shall keep records and submit quarterly reports which shall include the following information:
 - (A) Calendar dates covered by the reporting period.
 - (B) If fuel sampling and analysis is used to demonstrate compliance with 40 CFR 60.42c, the Permittee shall keep records and submit a quarterly report including the following information;
 - (i) Each 30-day average sulfur content calculated during the reporting period, ending with the last 30-day period in the quarter;
 - (ii) Reasons for any noncompliance with the standard; and
 - (iii) A description of corrective actions taken.
 - (C) If fuel supplier certification is used to demonstrate compliance with 40 CFR 60.42c the Permittee shall keep records and submit a quarterly report including the following information;
 - (i) Fuel supplier certification which shall include:
 - (a) The name of the oil supplier; and
 - (b) A statement for the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.
 - (D) Pursuant to 40 CFR 60.49c(g), the Permittee shall record and maintain daily records of the amount of natural gas and Jet A fuel combusted per day. Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS Subpart Db (See Appendix B), it should follow that it is also an "oil" within the meaning of Subpart Dc.
 - (E) In addition to this the quarterly report shall include a certified statement signed by the owner or operator that the records of the fuel supplier certifications submitted represent all the fuel combusted during the quarter.
- (d) The (4) four storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb). This regulation applies since these storage tanks each have a maximum storage capacity greater than 40 m³ and were installed after July 23, 1984. Each of the four storage tanks has a storage capacity of 94.64 cubic meters and is used to store Jet A fuel. Jet A fuel has a maximum true vapor pressure of 9 kPa. Since these tanks have a storage capacity greater than 75 m³ but less than 151 m³ and are used to store a liquid with a maximum true vapor pressure less than 15kPa, the only applicable requirements are record keeping requirements under 40 CFR 60.116(a) and (b).
- (e) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.741, Subpart GG), even though HAP emissions are less than major

source thresholds, because the potential to emit HAPs at the time of rule promulgation was assumed to be greater than the major source thresholds (based on EPA determination).

- (1) The Permittee submitted an initial notification report pursuant to 40 CFR 63, Subpart GG on August 14, 1997.
- (2) Pursuant to 40 CFR 63.743(b), the Permittee is required to submit a startup, shutdown, and malfunction plan, except for dry particulate filter systems operated per manufacturers instructions. The Permittee submitted a startup/shutdown/malfunction plan August 31, 1998. There are no other associated requirements.
- (3) The following housekeeping requirements apply unless the cleaning solvent used is identified in Table 1 of 40 CFR 63.744 (shown below), or contains HAP and VOC below the de minimus levels specified in 40 CFR 63.741(f) pursuant to 40 CFR 63.744(a):
 - (A) the Permittee should place cleaning solvent laden cloth, paper, or other absorbent applicators in bags or other closed containers upon completing their use [40 CFR 63.744(a)(1)]
 - (B) Store cleaning solvents (except semi-aqueous) in closed containers. [40 CFR 63.744(a)(2)]

Table 1 of 40 CFR 63.744: Composition Requirements of Approved Cleaning Solvents

Cleaning Solvent Type	Composition Requirements
Aqueous.....	Cleaning solvents in which water is the primary ingredient (80 percent of cleaning solvent solution as applied must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined along with a variety of additives, such as organic solvents (e.g. high boiling point alcohols, builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents). Aqueous solutions must have a flash point greater than 93EC (200EF)(as reported by the manufacturer), and the solution must be miscible with water.
Hydrocarbon Based.....	Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20EC(3.75 in H ₂ O and 68EF). These cleaners also contain no HAP.

- (4) Except for the cleaning of spray gun equipment, all hand wipe cleaning solvents must meet the composition requirements identified in Table 1 of 40 CFR 63.744: Composition Requirements of Approved Cleaning Solvents and have a composite vapor pressure 45 mm Hg at 20 °C or meet the 60% volume reduction requirements specified in an alternative compliance plan. [40 CFR 63.744(b)]
- (5) For spray gun cleaning operations, the Permittee shall use one of the four specified techniques or their equivalent, pursuant to 40 CFR 63.744(c). The Permittee requested an equivalency determination from EPA for the hand wiping of disassembled spray gun parts. EPA determined that hand wiping fell under the requirements of hand wiping operations and therefore an equivalency determination was not necessary. Also note that composition requirements of Table

- 1 of 40 CFR 63.744: Composition Requirements of Approved Cleaning Solvents listed above do not apply to hand wiping of spray gun equipment. For enclosed spray gun cleaners, if leaks are found during the monthly inspection, the Permittee should repair as soon as practicable, but within 15 days, pursuant to 40 CFR 63.744(c)(1)(ii). If cleaning solvent solutions that contain HAP and VOC below the de minimis levels are used, those cleaning operations using such solutions are exempt from the requirements of 40 CFR 63.744(c).
- (6) For flush cleaning operations, the Permittee must empty used cleaning solvent into enclosed container, collection system, or system with equivalent emission control pursuant to 40 CFR 63.744(d).
 - (7) The following conditions apply to uncontrolled primer coating operations. Organic HAP and VOC content limits: 350 grams/liter(540 for self priming topcoat) (2.9 lb/gal less water for HAP and less water and exempt solvents for VOC) as applied. pursuant to 40 CFR 63.745(c)(1)-(2). Compliance shall be achieved through:
 - (A) using coatings below content limits, or
 - (B) using monthly volume weighted averaging (primers only) to meet content limits [40 CFR 63.745(e)]
 - (8) The following conditions apply to uncontrolled topcoat coating operations. Organic HAP and VOC content limit: 420 g/l (3.5 lb/gal less water for HAP, and less water and exempt solvents for VOC) (540 for self priming topcoat) as applied. [40 CFR 63.745(c)(3)-(4)] Compliance shall be achieved through:
 - (A) using coatings below content limits, or
 - (B) using monthly volume weighted averaging (topcoats) to meet content limits [40 CFR 63.745(e)]
 - (9) The following conditions apply to Controlled Primer and Topcoat Application Operations. Control system must reduce organic HAP and VOC emissions to the atmosphere 81%, using capture and destruction/removal efficiencies. [40 CFR 63.745(d)].
 - (10) The following conditions apply to all Primer and Topcoat Application Operations:
 - (A) Minimize spills during handling and transfer. [40 CFR 63.745(b)]
 - (B) Specific application techniques must be used. [40 CFR 63.745(f)(1)]
 - (C) Exemptions from B (above) provided for certain situations. [40 CFR 63.745(f)(3)]
 - (D) All application equipment must be operated according to manufacturers specifications, company procedures, or locally specified operating procedures (whichever is most stringent). [40 CFR 63.745(f)(2)]
 - (E) Operating requirements for the application of primers or topcoats that contain inorganic HAP, including control with either particulate filters (see Tables 1 through 4 of 40 CFR 63.745) or water-wash system. Painting operation(s) must be shutdown if operated outside manufacturers specified limits. [40 CFR 63.745(g)(1) through(3)]
 - (F) Exemptions from E (above) provided for certain application operations. [40 CFR 63.745(g)(4)]
 - (11) The Permittee has the following testing requirements for cleaning operations:

- (A) Composition determination using manufacturers data [40 CFR 63.750(a)]
 - (B) Vapor Pressure determination using readily available sources such as MSDS if single component; composite vapor pressure determined by manufacturer's supplied data or ASTM E 260-91 and by equation provided for multiple component solvents. [40 CFR 63.750(b)]
- (12) The Permittee has a monthly visual leak inspection for enclosed spray gun cleaners [40 CFR 63.751(a)] as a monitoring requirement for cleaning operations.
- (13) The Permittee has the following record keeping requirements for cleaning operations
- (A) If complying with the composition requirements, the name, data/calculations, and annual volumes. [40 CFR 63.752(b)(3)]
 - (B) If complying with the vapor pressure limit, the name, vapor pressure, data/calculations/test result, and monthly volumes [40 CFR 63.752(b)(3)]
 - (C) For noncompliant cleaning solvents used in exempt operations, the name, monthly volumes by operation, and master list of processes. [40 CFR 63.752(b)(4)]
- (14) The Permittee has the following reporting requirements for cleaning operations:
- (A) Semiannual reports: Statement certifying compliance. [40 CFR 63.753(b)(1)(v)]
 - (B) Semiannual report for hand wiping operations, noncompliant cleaning solvent used. [40 CFR 63.753(b)(1)(i)]
 - (C) Semiannual report of all new cleaning solvents and their composite vapor pressure or notifications of compliance with composition requirements [40 CFR 63.753(b)(1)(ii)]
 - (D) Semiannual report of noncompliant spray gun cleaning method used. [40 CFR 63.753(b)(1)(iii)]
 - (E) Leaks from enclosed spray gun cleaners not repaired within 15 days. [40 CFR 63.753(b)(1)(iv)]
- (15) The Permittee has the following testing requirements for coating operations:
- (A) Uncontrolled coatings that are not averaged, each 24 hours is considered a performance test; for uncontrolled coatings which are averaged, each 30 day period is a performance test. An organic level determination is made pursuant to 40 CFR 63.750(c) and (d), and a VOC level determination is made pursuant to 40 CFR 63.750(e) and (f). An initial performance test is required for all control devices, used to control VOC and organic HAPs, to demonstrate compliance with overall control efficiency requirements, pursuant to 40 CFR 63.749(d)(2).
- (16) The Permittee has the following record keeping requirements for coating operations:
- (A) For all coatings, the name and VOC content as received and applied [40 CFR 63.752(b)(5)]
 - (B) For "compliant" coatings, organic HAP and VOC contents as applied, data/calculations and test results used to determine HAP/VOC content as (Hi and Gi), and monthly usage. [40 CFR 63.753(c)(2)]
 - (C) For "Low-HAP content" primers, annual purchase records, and data/calculations and test results used to determine H_i or HAP/VOC content as applied.

- (D) For "averaged" coatings, monthly volume-weighted average values of HAP/VOC content (H_a and G_a), and data/calculations and test results used to calculate H_a and G_a . [40 CFR 63.752(c)(4)]
- (17) The Permittee has the following reporting requirements for coating operations:
 - (A) All instances where organic HAP/VOC limits were exceeded. [40 CFR 63.753(c)(1)(i) and (ii)]
 - (B) Control device exceedances (out of compliance). [40 CFR 63.753(c)(1)(iii), (iv), and (v)]
 - (C) Periods when operation not immediately shut down when the pressure drop or water flow rate was outside limits. [40 CFR 63.753(c)(1)(vii)]
 - (D) Statement certifying compliance. [40 CFR 63.753(c)(1)(vii)]
- (e) 40 CFR 63 Subpart T and 326 IAC 20 does not apply any of the cold degreasers, since they do not use solvents containing any of the components listed in 40 CFR 63.460(a).
- (f) Neither the source or any emission unit at the source is subject to the requirements of 40 CFR Part 64 Compliance Assurance Monitoring because no Pollutant Specific Emissions Unit (PSEU) at the source has actual emissions after control in excess of a major source threshold and utilizes a control device to comply with an applicable requirement.
- (g) United Airlines IMC, is not a major source of HAPs. therefore, the source does not meet both applicability criteria of 40 CFR 63.50. United Airlines IMC is not subject to the requirements of Section 112(j).

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The Permittee has submitted an Emergency Reduction Plan (ERP) on 11/27/96. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6-3 (Preventive Maintenance Plan)

The following emission units are required to have a Preventive Maintenance Plan (PMP);

- (1) Boilers 001 and 002, because 40 CFR 60, Subpart Dc applies,
- (2) Boilers 003 and 004, because 40 CFR 60, Subpart Db applies,
- (3) Paint Booths identified as 017 and 018, because 40 CFR 63, Subpart GG applies.

326 IAC 2-2 (PSD Rules)

Fuel restrictions in place from construction permit CP 096-00156-01, issued on November 29, 1996, restrict SO_2 emissions to less than 100 tons per year and also restrict NO_x emissions to below 250 tons per year so that source wide emissions of NO_x and SO_2 are not greater than PSD thresholds pursuant to 326 IAC 2-2. The Permittee opted to keep the fuel restrictions previously imposed to prevent the applicability of 326 IAC 2-3 (Emission Offset), which no longer applies to sources in Marion County. The paint booth modifications dated 2000 and 2001 were not above major modification levels for any pollutant.

326 IAC 2-3 (Emission Offset Rules)

- (b) This source was located in a non-attainment area for ozone at the time CP 094-00156-01 was issued, which was November 29, 1994. However, the area was classified as attainment for ozone on November 30, 1994. The Permittee requested and received a revised construction permit CP 096-001560-01 on November 12, 1996, which relaxed the limitations on VOC and NO_x but did not

relax limitations on SO₂ and fuel limitations that existed in the previous construction permit, therefore previous SO₂ limits and fuel limitations from CP 096-001560-01 are still in effect, although the emission offset rules do not apply. The source has opted to retain the fuel limitations.

(b) 326 IAC 2-3 Sulfur Dioxide (SO₂) [CP096-00156-01]

- (1) The Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The fuel usage limitations equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month rolling period. This condition carried over from CP 960156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.

Facilities	Jet A Fuel gallons
12.6, 25.2, and two (2) 122 mmBtu per hour boilers combined	4,725,730
Three 1,505 HP Cummins Emergency Generator Engines combined	111,360
Five 480 HP Detroit Diesel Fire Pump Engines combined	7,500

- (2) The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request. Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1, 40 CFR 60.42b(j), and 326 IAC 12. This limit was originally put in place so that the requirements of 326 IAC 2-3 (Emission Offset) would not apply, the Permittee has requested that the limit remain.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

- (a) The coating operations, identified as EU13, and EU 17, are not subject to the requirements of 326 IAC 2-4.1 because they were constructed prior to the applicability date of July 1997,
- (b) The paint booths, identified as EU18, are not subject to the requirements of requirements of 326 IAC 2-4.1, because although constructed after July 1997, the HAP emissions at the entire source are less than 10 of a single HAP and 25 of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOCs and NO_x, and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Since the source is located in Marion County and is not located in the areas of Marion County referred to in 326 IAC 5-1-1(5), pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method

9 or fifteen (15) one (1) minute non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to this rule because the potential fugitive particulate matter emissions is less than twenty-five (25) tons per year.

State Rule Applicability - Individual Facilities

Boilers

326 IAC 6-1 (Nonattainment Area Limitations)

Since the source is located in Marion County, is not listed specifically in section 7 of rule 1, and the source does not have the potential to emit of PM greater than 100 tons per year or actual emissions of PM greater than 10 tons per year, 326 IAC 6-1 is not applicable.

326 IAC 6-2-4 (Indirect Heating Emissions Limitations)

This regulation applies to Boilers 001, 002, 003 and 004 since these emission units are indirect heaters and were installed after September 21, 1983. Pursuant to 326 IAC 6-2-4 the PM emissions are limited by the following equation:

$$Pt \sim \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input. As each new indirect heater is added to the plant Q will increase.

The value of Q for boilers 001 and 002 is 37.8 mmBtu/hr. Therefore, for boilers 001 and 002, Pt = 0.423 pounds per million Btu.

The value of Q for boilers 003 and 004 is 281.8 mmBtu/hr. Therefore, for boilers 003 and 004, Pt = 0.251 pounds per million Btu.

Based on AP-42 emissions factor for natural gas and AP 42 supplied emissions factors for No. 1 and 2 Fuel Oil (Jet A fuel) these boilers are in compliance with the particulate matter emissions limitations established under 326 IAC 6-2-4. New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart D has no applicable PM limits for these boilers.

326 IAC 3-5 (Continuous Monitoring of Emissions)

326 IAC 3-5 is applicable to facilities required to install continuous emission monitoring pursuant to 40 CFR 60 requirements, therefore, because continuous emissions monitoring system for NOx on boilers 003 and 004 were installed pursuant to 40 CFR 60.48b, the monitoring system must therefore be operated in compliance with 326 IAC 3-5-2, 326 IAC 3-5-3, 326 IAC 3-5-4 and 326 IAC 3-5-5.

The continuous opacity monitor installed pursuant to 40 CFR 60.48b for boilers 003 and 004, is subject to the requirements of 326 IAC 3-5. This monitoring system must therefore be operated in compliance with 326 IAC 3-5-2, 326 IAC 3-5-3, 326 IAC 3-5-4 and 326 IAC 3-5-5.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the boilers 002, 003, and 004 shall not exceed five-tenths (0.5) pound per million Btu heat input while combusting Jet A fuel. Pursuant to 40 CFR 60.42b(j), the Permittee shall ensure that the Jet A fuel used meets the definition of a "very low sulfur oil," meaning oil that contains no more than 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu.
- (b) Boilers 001, Emergency Generators 005 through 007, and Fire Pumps 008 through 012, are not subject to the requirements of 326 IAC 7-1.1-1 because they do not emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

Degreasing Operations

326 IAC 8-3-2 (Cold Cleaner Operation) - The organic solvent cold cleaner regulation applies to cold cleaner operations throughout the center since all degreasers were installed after January 1, 1990. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaning Degreaser Operation and Control) - The organic solvent cold cleaning degreaser regulation applies to cold cleaning degreaser operations throughout the center since all degreasers were installed after January 1, 1990.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Paint Booths

40 CFR 52 Subpart P (Particulate Matter (PM))

Pursuant to CP-096-00156-01, issued on November 25 1996, and 40 CFR 52 Subpart P, the PM from the four (4) paint booths (017 and 018) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 6-3-2(d) (Particulate)

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

326 IAC 8-2-9 does not apply to this source, since the parts and products do not match the types listed and the SIC (#45) does not match the industrial categories covered under this rule.

326 IAC 8-1-6 (General VOC Reduction for New Facilities)

326 IAC 8-1-6 does not apply to the four (4) paint booths (017 and 018) because potential to emit of VOC is less than 25 tons per year.

Service Hangars and Indirect Support Shops

326 IAC 8-1-6 (General VOC Reduction for New Facilities)

The General VOC Reduction Requirements do apply to this facility since there are no other applicable requirements under Article 8, the affected facilities were constructed after January 1, 1980 and the potential VOC emissions exceed 25 tons per year. BACT is established based on using coatings which meet the requirements of the California Aerospace Assembly and Component Coating Operations Regulation 8 Rule 29 and coating usages for 737 aircraft heavy maintenance visits. BACT consists of VOC content limits, equipment requirements, and work practices. This condition is carried over from CP 0960156-01.

The Permittee, in accordance with 326 IAC 8-1-6, shall achieve Best Available Control Technology for coatings used in the Service Hangars and Indirect Support Shops as specified below:

- (a) The Permittee shall not apply to aerospace components any coating in the following categories with a VOC content in excess of the following limits (except as noted in condition b), expressed as grams of VOC per liter (lbs/gal) of coating as applied, excluding water:

Coating Category	VOC content	
	g./liter	lbs/gal.
Primer - coatings applied directly to the aerospace component for the purpose of corrosion prevention, protection from the environment, functional fluid resistance and adhesion of subsequent coatings.	350	2.9
Adhesive bonding primer - coatings applied in a very thin film to aerospace metal for the primary purpose of providing a primer for a subsequent coating of structural adhesive.	850	7.1
Interior Topcoat - coating used in interior habitable spaces of aircraft	340	2.8
Electric or Radiation Effect Coating - Electrical conductive or insulative coatings and coatings used on radar and antennae enclosures.	800	6.7
Extreme Performance Interior Top Coat - A topcoat used in interior spaces of the aircraft areas requiring fluid, stain or nicotine barrier.	420	3.5
Fire Insulation Coating - Coatings used to provide a layer of insulation in the event of an aircraft or engine fire.	600	5.0
Fuel Tank Coating - Coatings applied to the interior of a fuel tank or fuel-wetted area of the aircraft to protect it from corrosion.	720	6.0
High-Temperature Coating - A coating that during its normal use must withstand temperatures in excess of 350 degrees Fahrenheit.	720	6.0
Sealant - A coating applied for the purpose of filling voids and providing a barrier against penetration of water, fuel or other fluids or vapors.	600	5.0
Self-priming Topcoat - A coating applied directly to the aerospace component that is not subsequently over coated.	420	3.5
Topcoat - Coatings applied over a primer or intermediate coating for the purposes such as appearance, identification or protection.	420	3.5

Coating Category	VOC content	
	g./liter	lbs/gal.
Pretreatment Wash Primer - A coating which contains a minimum of 0.5% acid by weight for surface etching and is applied directly to a bare metal surface to provide corrosion resistance and adhesion.	420	3.5
Sealant Bonding Primer - A coating applied in a very thin film to an aerospace component for the purposes of providing a primer for subsequent coat of silicon sealant.	720	6.0
Temporary Protection Coating - A coating applied to an aerospace component to protect it from any mechanical or environmental damage during manufacturing.	250	2.1

- (b) The aforementioned coating requirements shall not apply to:
- (1) Application of coating to assembled printed circuit boards
 - (2) Coating of paper, fabrics and films
 - (3) Applications of adhesives
 - (4) Use of Adhesive bonding primers that have a cure temperature in excess of 325 °F
 - (5) Use of hand held nonrefillable aerosol cans
 - (6) Application of coatings by template or hand in order to add designs, letters and/or numbers to the products
 - (7) Application of a solid film lubricant (anti-chafe coating)
 - (8) Coating of test panels used to evaluate coating performance
 - (9) Use of low usage coating which are coating with separate formulations that are used in volumes of less than 20 gallons per calendar year, provided that the requirements of D.1.5 (c) are met and no more than 200 gallons of low usage coatings may be classified as exempt per calendar year.
- (c) The Permittee shall provide a list in writing to OES of coatings to be covered under the low usage exemptions D.1.5(b)(9) for the following calendar year, the expected volume to be used and the maximum VOC content on an annual basis. The Permittee shall notify OES in writing of any additional coatings added to this list during the calendar year.
- (d) The Permittee shall maintain a document containing a list of all coatings with coating limitations which may be used during the following year, the coating category, the VOC limit for the coating category, the mix ratio (if applicable), and VOC content of the coating as applied expressed as pounds per gallon of coating less water on an annual basis. This document will be updated periodically and in the interim, memos containing the required information will be issued as needed for new coatings or reformulations of existing coatings.
- (e) Compliance with the coating limitations shall be based on methods specified in 326 IAC 8-1-4 (a).
- (f) The Permittee shall utilize High Volume, Low Pressure (HVLP) and/or touch up guns transfer technology when applying coatings by spray. HVLP shall mean coating equipment which is used

to apply coatings by means of a gun that operates between 0.1 and 10 psig air atomizing spray. Detailing guns shall mean small air-spray equipment, including air brushes, that operate at no greater than 5 cfm air flow and no greater than 50 psig air pressure. These requirements do not apply to aerosol spray paint cans.

The spray application requirements stated above shall not apply to the following:

- (1) The application of coatings to surface areas with limited access due to visual impairment which requires a 360 degree spray-gun extension.
- (2) The application of waterborne extreme performance interior topcoat coating.
- (3) The application of adhesive bonding primers and pretreatment wash primers.
- (4) The application of a textured finish coat. A textured finish coat shall be considered any coating used to produce a non-smooth, patterned surface that is intentionally produced and applied as a final coat by spraying drops of coating over a previously applied base coat.

Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Those processes are listed as follows:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (c) The following grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day : [326 IAC 6-3]

- (1) Grit Blast Cabinet BC-01
- (2) Grit Blast Cabinet BC-02
- (3) Grit Blast Cabinet BC-06
- (4) Grit Blast Cabinet BC-07
- (5) Grit Blast Cabinet BC-14
- (6) Grit Blast Cabinet BC-13
- (7) Grit Blast Cabinet BC-09
- (8) Grit Blast Cabinet BC-12
- (9) Grit Blast Cabinet BC-10
- (10) Grit Blast Cabinet BB-01
- (11) Grit Blast Cabinet BB-02
- (12) Grit Blast Cabinet BC-05
- (13) Grit Blast Cabinet BC-15
- (14) Grit Blast Cabinet BC-16
- (15) Grit Blast Cabinet EE-02
- (16) Grit Blast Cabinet PM-01
- (17) Grit Blast Cabinet BC-08
- (18) Grit Blast Cabinet BC-17
- (19) Grit Blast Cabinet BC-18
- (20) Grit Blast Room in the Sheet Metal Shop

(21) Grit Blast Cabinet BC-03

(22) Grit Blast Cabinet BC-04

- (d) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21) [326 IAC 6-3]
- (1) The following five emission units located throughout the facility including the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
- (A) Downdraft Benches
 - (B) ECB Booth
 - (C) Fugitives (Cleaning)
 - (D) Sanding Benches
 - (E) Touchup Booths
- (2) The following three emission units located in the Sheet Metal Shop and Composite Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
- (A) Cleaning Room
 - (B) Dinol Room
 - (C) Fugitives (Cleaning)
- (3) The following two emission units located in the Sidewall/Ceiling Shop of the Interior Shop with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year: [326 IAC 6-3]
- (A) Drawdown Bench for Vacuum mold
 - (B) Floorboard Router

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the Permittee, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a Permittee's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Boilers 1 and 2 have applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the #1 and #2 boilers' stack exhaust shall be performed once per shift during normal daylight operations while burning Jet A fuel. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation,

not counting startup or shut down time.

- (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the 12.6 and 25.2 mmBtu per hour boilers are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc). This regulation applies to the 12.6 and 25.2 mmBtu per hour boilers since these boilers have heat input capacity greater than 10 mmBtu per hour but less than 100 mmBtu per hour and were installed after June 9, 1989.

- (b) The painting operations EU 13 and EU17 have applicable monitoring conditions as specified below:
 - (1) Pursuant to 40 CFR 63.751(c)(1), the Permittee shall, while the primer or topcoat application operations are occurring, continuously monitor the pressure drop across the system, and read and record pressure drop once per shift.
- (b) The painting operations EU 18 have applicable monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack 018 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (4) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this stationary aerospace vehicle maintenance center shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-9602-00156.

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.6

110.4

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
				32.0		
	1.9	7.6	0.6	**see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	1.8	0.3	4.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Boiler 1 Gas

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Small Industrial Boiler**HAPs Emissions**

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.159E-04	6.623E-05	4.139E-03	9.934E-02	1.876E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.759E-05	6.071E-05	7.726E-05	2.097E-05	1.159E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Boiler 1 Jet A**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil**

Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.28

LPTE factor: 0.268

12.6

788.4

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	39.76 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.8	15.7	7.9	0.1	2.0
LPTE	0.21	4.20	2.11	0.04	0.53

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

The LPTE emissions = uncontrolled emissions (ton/yr) * LPTE emission factor

The LPTE emission factor = (unit MMBtu/total boiler MMBtu X limited kgal)/potential throughput kgal)

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See page 2 for HAPs emission calculations.

updated 4/99

Boiler 1 Jet A

Appendix A: Emissions Calculations

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Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)

#1 and #2 Fuel Oil

HAPs Emissions

Company Name: Indianapolis Maintenance Center

Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	2.21E-04	1.66E-04	1.66E-04	1.66E-04	4.97E-04

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.66E-04	3.31E-04	1.66E-04	8.28E-04

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

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Boiler 2 Gas

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

25.2

220.8

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
--	-----	-------	-----	-----	-----	----

Emission Factor in lb/MMCF	1.9	7.6	0.6	32.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	3.5	0.6	9.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Boiler 2 Gas

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Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

CP: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.318E-04	1.325E-04	8.278E-03	1.987E-01	3.753E-04

--	--	--	--	--	--

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.519E-05	1.214E-04	1.545E-04	4.194E-05	2.318E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Boiler 2 Jet A

Appendix A: Emissions Calculations Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr) #1 and #2 Fuel Oil

Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.28

LPTE factor: 0.268

25.2

1576.8

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	39.76 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	1.6	31.3	15.8	0.3	3.9
LPTE	0.42	8.40	4.23	0.07	1.06

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emission calculations.

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Boiler 2 Jet A

Appendix A: Emissions Calculations

Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)

#1 and #2 Fuel Oil

HAPs Emissions

Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	2.21E-04	1.66E-04	1.66E-04	1.66E-04	4.97E-04

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.66E-04	3.31E-04	1.66E-04	8.28E-04

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

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Boiler 3 Gas

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Utility Boiler

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

122.0

1068.7

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.0	4.1	0.3	53.4	2.9	44.9

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Utility Boiler

HAPs Emissions

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.12E-03	6.41E-04	4.01E-02	9.62E-01	1.82E-03

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.67E-04	5.88E-04	7.48E-04	2.03E-04	1.12E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Boiler 4 Jet A**Appendix A: Emissions Calculations
Industrial Boilers (> 100 mmBtu/hr)
#1 and #2 Fuel Oil**

updated 4/99

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Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
CP: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.28

LPTE factor: 0.268

122

7633.71429

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	39.76 (142.0S)	24.0	0.20	5.0
Potential Emission in tons/yr	7.6	151.8	91.6	0.8	19.1
LPTE	2.05	40.67	24.55	0.20	5.11

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

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Appendix A: Emissions Calculations
Industrial Boilers (> 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

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Company Name: Indianapolis Maintenance Center
Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.28

LPTE factor: 0.268

122

7633.71429

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	39.76 (142.0S)	24.0	0.20	5.0
Potential Emission in tons/yr	7.6	151.8	91.6	0.8	19.1
LPTE	2.05	40.67	24.55	0.20	5.11

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

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Boiler 4 Jet A

Appendix A: Emissions Calculations Industrial Boilers (> 100 mmBtu/hr) #1 and #2 Fuel Oil HAPs Emissions

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Company Name: Indianapolis Maintenance Center

Address, City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

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Boiler 4 Gas

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Utility Boiler

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

122.0

1068.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.0	4.1	0.3	53.4	2.9	44.9

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Boiler 4 Gas

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Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Utility Boiler

HAPs Emissions

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

CP: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.12E-03	6.41E-04	4.01E-02	9.62E-01	1.82E-03

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.67E-04	5.88E-04	7.48E-04	2.03E-04	1.12E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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Fire Pump 1

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Pit ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity

MM Btu/hr
1.2

79.2

kgal/yr

LPTE factor:

0.02

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO

Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	1.66	1.66	1.55	23.57	1.92	5.08
LPTE	0.04	0.04	0.04	0.56	0.05	0.12

B. Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

Potential Throughput
hp-hr/yr

480.0	4204800.0					
	Pollutant					
Emission Factor in lb/hp-hr	PM* 0.0022	PM10* 0.0022	SO2 0.0021	NOx 0.0310	VOC 0.0025	CO 0.0067
Potential Emission in tons/yr	4.63	4.63	4.31	65.17	5.29	14.04

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

icdsl250.wk4 9/95

updated 4/99

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Fire Pump 2

Appendix A: Emission Calculations Internal Combustion Engines - Diesel Fuel Turbine (>250 and <600 HP) Reciprocating

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity

MM Btu/hr

1.2	79.2	kgal/yr	LPTE factor:	0.02		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	1.66	1.66	1.55	23.57	1.92	5.08

LPTE	0.04	0.04	0.04	0.56	0.05	0.12
------	------	------	------	------	------	------

B. Emissions calculated based on output rating (hp)

Heat Input Capacity

Potential Throughput

Horsepower (hp)

hp-hr/yr

480.0		4204800.0				
	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	4.63	4.63	4.31	65.17	5.29	14.04

Methodology

Potential Througput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl250.wk4 9/95

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

updated 4/99

Fire Pump 3

Appendix A: Emission Calculations

Internal Combustion Engines - Diesel Fuel

Turbine (>250 and <600 HP)

Reciprocating

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity

MM Btu/hr

1.2	79.3	kgal/yr	LPTE factor:	0.02		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	1.66	1.66	1.55	23.60	1.93	5.08
LPTE	0.04	0.04	0.04	0.56	0.05	0.12

B. Emissions calculated based on output rating (hp)Heat Input Capacity
Horsepower (hp)Potential Throughput
hp-hr/yr

480.0		4204800.0					
Emission Factor in lb/hp-hr		Pollutant					
		PM*	PM10*	SO2	NOx	VOC	CO
		0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr		4.63	4.63	4.31	65.17	5.29	14.04

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl250.wk4 9/95

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

updated 4/99

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Fire Pump 4**Appendix A: Emission Calculations****Internal Combustion Engines - Diesel Fuel****Turbine (>250 and <600 HP)****Reciprocating****Company Name:** Indianapolis Maintenance Center**Address City IN Zip:** 2825 West Perimeter Road, Indianapolis, IN 46241**TV:** 097-9602-00156**Plt ID:** 00156**Reviewer:** Holly Stockrahm**Date:** 01/08/2003**A. Emissions calculated based on heat input capacity (MMBtu/hr)**Heat Input Capacity
MM Btu/hr

1.2	79.3	kgal/yr	LPTE factor:	0.02		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	1.66	1.66	1.55	23.60	1.93	5.08
LPTE	0.04	0.04	0.04	0.56	0.05	0.12

B. Emissions calculated based on output rating (hp)

Heat Input Capacity

Potential Throughput

Horsepower (hp)

hp-hr/yr

480.0		4204800.0					
	Emission Factor in lb/hp-hr	Pollutant					
		PM*	PM10*	SO2	NOx	VOC	CO
		0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
	Potential Emission in tons/yr	4.63	4.63	4.31	65.17	5.29	14.04

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl250.wk4 9/95

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

updated 4/99

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Fire Pump 5**Appendix A: Emission Calculations****Internal Combustion Engines - Diesel Fuel****Turbine (>250 and <600 HP)****Reciprocating****Company Name:** Indianapolis Maintenance Center**Address City IN Zip:** 2825 West Perimeter Road, Indianapolis, IN 46241**CP#:** 097-9602-00156**Plt ID:** 00156**Reviewer:** Holly Stockrahm**Date:** 01/08/2003**A. Emissions calculated based on heat input capacity (MMBtu/hr)**

Heat Input Capacity

MM Btu/hr

1.2	79.3	kgal/yr	LPTE factor:	0.02		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
	Potential Emission in tons/yr	1.66	1.66	1.55	23.60	1.93
LPTE	0.04	0.04	0.04	0.56	0.05	0.12

B. Emissions calculated based on output rating (hp)Heat Input Capacity
Horsepower (hp)Potential Throughput
hp-hr/yr

480.0		4204800.0					
		Pollutant					
		PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr		0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr		4.63	4.63	4.31	65.17	5.29	14.04

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl250.wk4 9/95

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

updated 4/99

Generator 1**Appendix A: Emission Calculations**

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Internal Combustion Engines - Diesel Fuel**Turbine (>600 HP)**

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)Heat Input Capacity
MM Btu/hr

S= 0.28 = WEIGHT % SULFUR

2.7	173.4	kgal/yr	LPTE factor:	0.21		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.3	3.2	0.1	0.85
Potential Emission in tons/yr	1.2	0.7	(1.01S)	**see below		
LPTE	0.25	0.14	0.71	8.02	0.23	2.13

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)Heat Input Capacity
Horsepower (hp)Potential Throughput
hp-hr/yr

S= 0.28 = WEIGHT % SULFUR

1050.0	9198000.0					
Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007		0.0023	0.024	0.00071	0.00550
		not provided	(.00809S)	**see below		
Potential Emission in tons/yr	3.2	0.0	10.4	110.4	3.2	25.3

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl600.wk4 9/95

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

updated 4/99

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Generator 2

Appendix A: Emission Calculations

Internal Combustion Engines - Diesel Fuel

Turbine (>600 HP)

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

S= 0.28 = WEIGHT % SULFUR

2.7	173.4	kgal/yr	LPTE factor:	0.21		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.3	0.0	0.1	0.85
			(1.01S)	**see below		
Potential Emission in tons/yr	1.2	0.7	3.3	0.0	1.1	9.9
	0.25	0.14	0.71	0.00	0.23	2.13

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)Heat Input Capacity
Horsepower (hp)Potential Throughput
hp-hr/yr

S= 0.28 = WEIGHT % SULFUR

1505.0		13183800.0				
Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007		0.0023	0.000	0.00071	0.00550
		not provided	(.00809S)	**see below		
Potential Emission in tons/yr	4.6	4.6	14.9	0.0	4.6	36.3

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

icdsl600.wk4 9/95

updated 4/99

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Generator 3**Appendix A: Emission Calculations****Internal Combustion Engines - Diesel Fuel****Turbine (>600 HP)**

Company Name: Indianapolis Maintenance Center

Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241

TV: 097-9602-00156

Plt ID: 00156

Reviewer: Holly Stockrahm

Date: 01/08/2003

A. Emissions calculated based on heat input capacity (MMBtu/hr)Heat Input Capacity
MM Btu/hr

S= 0.28 = WEIGHT % SULFUR

2.7	173.4	kgal/yr	LPTE factor:	0.21		
Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.3	3.2	0.1	0.85
Potential Emission in tons/yr	1.2	0.7	(1.01S)	**see below		
	1.2	0.7	3.3	37.5	1.1	9.9

LPTE	0.25	0.14	0.71	8.02	0.23	2.13
------	------	------	------	------	------	------

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Potential Throughput S= 0.28 = WEIGHT % SULFUR

Horsepower (hp)

hp-hr/yr

1050.0	9198000.0
--------	-----------

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	not provided	0.0023 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	3.2	0.0	10.4	110.4	3.2	25.3

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

icdsl600.wk4 9/95

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

updated 4/99

Appendix A: Emissions Calculations

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VOC and Particulate

From Surface Coating Operations

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Aircraft	Bays per fleet	Planes per year HMF	Planes per year C check	Planes per year Corrosion	Planes per year other	HMF Factor	HMF ISS Aircraft Equivalence	C Check ISS Factor	C Check ISS Aircraft Equivalence
757	3	35	96	0	1.50	1.786	63	1.8	173
767	2	24	48	0	0.50	2.7	65	2.7	130
737	12	96	265	41	3.50	1	96	1.0	265

Total 223 Total 567

Aircraft Hangar Floor Paint Room Strip/Surface Other

	lb/plane	Emissions ton/yr	lb/plane	Emissions ton/yr	lb/plane	Emissions ton/yr	lb/plane	Emissions ton/yr
757-HMV	94.4	1	220	4	156	3	190	3
767-HMV	141.6	3	245	3	156	2	214	3
737-HMV	52.4	3	147	7	154	7	135	6
757-CChk	83.0	4	0	0	0	0	0	0
767-CChk	92.4	2	0	0	0	0	0	0
737-CChk	55.3	7	0	0	0	0	0	0
737-RChk	14.8	0	0	0	0	0	0	0
TOTAL		20		14		12		12

Shops	lb/plane	ton/yr	HAPS	ton/yr	HAPS	ton/yr
Interior Shop	64.33	0.00	MEK	2.04	Glycol	<0.01
other Interior Shops	20.35	0.00	Toluene	0.92	Methylene Chloride	0.41
Machine Rework	2.15	0.00	Xylene	0.23	Methanol	0.01
Paint Shop Paint Booth	146.86	0.00	MIBK	0.32		
Other shops in Paint Shop	8.48	0.00	Chromium	0.52		
Heat Exchanger	19.35	0.00	Diisocyanate	0.01		
Metal Fabricator	38.47	0.00	Methyl Chloroform	0.95		
All other indirect shops	28.86	0.00	Phenol	0.08		
	Total	0	Ethylbenzene	<0.01		
Total Emissions from All Surface Co	94		Total Haps:	5.49		

Notes: Source submitted these calculations. Source has taken a limit of 95 tpy VOC

Appendix A: Emissions Calculations

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Summary

Sourcewide Limited Potential to Emit

Company Name: Indianapolis Maintenance Center
Address City IN Zip: 2825 West Perimeter Road, Indianapolis, IN 46241
TV: 097-9602-00156
Plt ID: 00156
Reviewer: Holly Stockrahm
Date: 01/08/2003

Limited Potential to Emit

Pollutant	PM	PM10	SO2	NOx	VOC	CO	HAPs
Boilers-Gas	2.30	9.40	0.70	113.10	6.70	103.70	neg
Boilers-Jet	4.60	4.60	93.94	55.43	0.51	11.80	neg
Fire Pumps	0.20	0.20	0.20	2.80	0.25	0.60	neg
Generators	0.75	0.42	2.13	3.30	0.69	12.00	neg
Surface Coating	neg				95.00		5

Total	5.00	10.02	96.27	116.30	102.64	116.30	5